### Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of	)	
Amendment of the Commission's Rules Concerning Maritime Communications	) )	PR Docket No. 92-257
Petition for Rule Making filed by Regionet Wireless License, LLC	)	RM-9664

### Reply to Opposition to Petition for Reconsideration

Warren C. Havens ("Havens") and Telesaurus Holdings GB, LLC ("Telesaurus") (in which Havens holds majority controlling interest) (together, "LMS Wireless," their DBA ["LMSW"]), hereby reply to the Opposition filed by Mobex to the LMSW petition for reconsideration filed in the above-captioned matter (the "Petition") regarding certain decisions made in the Second Memorandum Opinion and Order and Fifth Report and Order in the above-captioned proceeding released April 8, 2002 (the "2<sup>nd</sup> MO&O and 5<sup>th</sup> R&O").

Contrary to Mobex in its Opposition, the Petition had an entirely sound, documented basis for its claim that a major percentage of current AMTS licenses, especially those of Mobex<sup>1</sup>, are invalid, and indeed, under rules, many have been automatically terminated without specific Commission action (see attachment below). In this regard, attached hereto is the LMSW Opposition filed on 9-23-2002 to the Mobex and PSI Petitions for Reconsideration filed in the above-captioned matter, relating to service and interference contours. The majority of that Opposition deals with the failures of incumbent AMTS licenses, especially those of Mobex (and

Herein by Mobex, we mean Mobex and Regionet, wholly owned by Mobex.

Regionet), to meet rule requirements at the application stage, at the construction deadline, and upon renewal. It is therefore relevant and included herein as an attachment.

Contrary to Mobex, the matters of the above paragraph (the defects in and invalidity of various Mobex AMTS licenses and stations) is centrally relevant to the Petition for reasons given in the Petition, in sum, these matters relate to the amount of spectrum available to be set aside for Public Safety ("PS") and Critical Infrastructure ("CI") under the Petition's proposal.

Contrary to Mobex, this proceeding is an appropriate place for the Petition, since it asked for reconsideration of the main decision in the 5<sup>th</sup> R&O to auction AMTS spectrum not yet licensed. LMSW intends to submit a petition asking the FCC to initiate a notice and comment rulemaking regarding the alternative to such auction decision outlined in the Petition. (There may be other signatories, PS and CI entities, to such rulemaking petition.) However, the Petition was a necessary first filing without which the rulemaking petition would have no basis. PS and CI organizations have expressed interest in the proposal within the Petition to LMSW and will comment on their interest in such a rulemaking. Also, scores of rural utilities have already expressed interest in allocation of AMTS spectrum not yet licensed to Critical Infrastructure: see WT Docket No. 02-224.<sup>2</sup>

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See the Comments of Data Comlink, Inc. ("DCL") representing 20 electric cooperatives and allied companies, whose names are listed, and the Reply Comments of the North Carolina Electric Membership Corporation ("NCEMC") representing 26 listed electric cooperative company members.

Also, various PS and CI entities have commented to the FCC as to their needs for spectrum in and near the VHF range in various dockets, including the Spectrum Task Force Docket 02-135, and the Docket 02-361 regarding the NTIA study of spectrum needs by CI.

Further, the consulting firm KPMG was hired by the United Telecom Council to prepare a study on meeting needs of US CI entities for new wireless systems in which they identified a major need for more VHF/ 220 MHz-range spectrum. This study was presented at the UTC annual meeting June 19, 2002. LMSW was in attendance.

Mobex claims the LMSW proposal, entitled ATLIS, is not clear, has changed from LMSW past proposal, and suggests it is a divergence from AMTS historical use. First, the proposal in the Petition is not to fully implement ATLIS, but to set aside AMTS not yet licensed for PS and CI. This proposed set-aside action stands alone from the full ATLIS proposal, although it would serve to implement a component of the ATLIS proposal. Further, change from past proposals is irrelevant. (Mobex misrepresents what change there was, but this entire point is irrelevant.) The ATLIS proposal is clear, and its statements on the need by PS and CI for more spectrum are well documented with citations. Mobex simply does not know these needs or chooses to misrepresent them. They are well documented and accepted by the FCC, NTIA, and various PS and CI organizations. There is no current allocation, or allocation being considered by the FCC in a rulemaking, which comes close to satisfying these needs. There is clear interest by PS and CI as noted above in the Petition's proposal and the overall ATLIS proposal. Finally, the ATLIS proposal would include services to vessels as part of one of its central goals of providing wireless services to transportation infrastructure entities. The FCC has decided to license AMTS for land areas, and to lift the past requirement (in the old §80.475(a)) for coverage to waterways. Thus, the ATLIS proposal is consistent with both historical AMTS maritime communication purposes, and the current FCC decision to extend it to land service. In addition, under the ATLIS proposal, Federal agents involved with maritime matters, including the Coast Guard and others, would have access to spectrum and shared networks, appropriatly extending the historical maritime AMTS scope of service for greater public service.

Mobex misrepresents the ATLIS proposal by suggesting that a certain idea described in the proposal as to how it may facilitate, at a later stage, generation of fees, which Mobex calls a tax, is essential to the proposal. It is not and was not described as such. The proposal is clear in what is essential: allocation of specific spectrum for PS and CI with which they can do as they please. In addition, the proposal suggests how such allocations, adjacent to each other and to existing private-enterprise allocations, may pursue cost- and spectrum- efficient shared networks and other relations and services. If Mobex had valid licenses and services, it would probably like the ALTIS proposal, since it would clearly benefit all existing licensees in AMTS, 218 MHz, and 220 MHz.

In sum, the Mobex Opposition provides no valid opposition of any fact or argument in the Petition. It goes so far as to say that the status of the Mobex licenses is irrelevant, which as discussed above could not be more off the mark. In addition, its suggestion that its AMTS licenses are not subject to the defects the Petition described is fully refuted in the attachment hereto (as well as the evidence noted in the Petition). The FCC cannot rightfully ignore this, from and based on its own files on the subject licenses.

Accordingly, the Petition should be granted for reasons given in the Petition and above. The FCC should suspend its decision to auction AMTS and instead, on its own motion, or upon petition by LMSW and/or others as noted above, commence a rulemaking to obtain public comments, including from PS and CI organizations and entities, then decide whether to allocate AMTS spectrum not under valid licenses to Public Safety and Critical Infrastructure. There is clearly a great need for spectrum in the VHF and nearby ranges for this purpose.

In any case, the FCC should conduct appropriate investigations and hearings to determine which AMTS licenses are not valid due to not meeting application, construction deadline, operational, and renewal requirements, and then terminate defective Licenses. (Per evidence in the Files, many are already automatically terminated as noted above. see attachment hereto.)

### Respectfully submitted,

### Warren Havens

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Filed via the FCC ECFS October 3, 2002

Attachment follows

### Attachment

(Follows)

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In the Matter of	)	
Amendment of the Commission's Rules Concerning Maritime Communications	)	PR Docket No. 92-257
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Regionet Wireless License, LLC	)	

To: The Commission

### **Opposition to Petition for Reconsideration**

Warren C. Havens ("Havens") is a licensee in the AMTS service. Havens hereby submits this opposition to the petitions for reconsideration submitted by Mobex Communications, Inc. (Mobex) and Paging Systems, Inc. ("PSI") of the rules establishing service contours and interference protection contours in the AMTS service adopted in the Firth Report and Order in the above docket<sup>1</sup> (the "Petitions," the "Contour Rules" the "5<sup>th</sup> R&O"). This opposition is mostly directed at the Mobex Petition, but as the context and licensing files makes clear, it also addresses the PSI Petition. When "Petitioner" is used herein, it means Mobex, and where applicable, PSI as well.

### There Can Be No Claim of Damage by New, *Initial* Rules

Petitioner cannot claim that, where there have been no rules on a matter, initial rules on the matter cause them harm. Petitioner's licenses had no rights regarding service and interference contours prior to the 5<sup>th</sup> R&O, and thus, the adoption of the Contour Rules in the 5<sup>th</sup> R&O causes their licenses no harm. Petitioner clearly took the risk, in obtaining AMTS licenses using service and interference contours that it selected when the Commission had no rules on

<sup>1</sup> Second Memorandum Opinion and Order and Fifth Report and Order, FCC 02-74, PR Docket No. 92-257.

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these matters, that the Commission would one day adopt rules with other contours.<sup>2</sup> Petitioner cannot ask and the Commission has no basis to provide relief from the results of this risk taking.

Also, for reasons given above, the PSI argument, in which Mobex joined, that the FCC can't take back the contours they want, fails. The FCC can't take back what it never granted.

Petitions Based on "Continuity" Rule Now Eliminated. Argument Thus Moot

Petitioner claims that if its AMTS stations were subject to the Contour Rules then it could not satisfy the requirements under §80.475(a) for continuity of coverage. However, the

Their selection of large contours was obviously to gain the maximum licensed area and keep competitors away, not to serve maritime traffic. This could not be clearer by looking at the placement of their stations, and comparing this to the coastlines they are licensed to serve. Compare this to the Watercom stations placement (all established prior to the Watercom purchase by Mobex by a barge company to actually serve its and other barges) along the Mississippi River and Gulf Coast—these are all right along these waterways. Petitioner's contours are insufficient for the service both to the subject coastlines and for what their stations are actually intended to serve, the urban markets where the majority of their stations lie. Petitioner's service contour may be adequate for actual marine stations, at locations along the coastline serving vessels with installed radios and antennas, but not for service to such marine traffic from stations far inland, especially when shielded by mountain ranges, as is the case for numerous stations of Petitioner.

Petitioner took risk and cashed in on it by using contours that theoretically covered some of the licensed coastlines (but provided far less than the required continuity of coverage, even with theoretical F50-50 contours) but actually would not provide effective service along such coastline. If Petitioner denies this, it can simply demonstrate the coverage by citing customers, with contact information, who can verify actual continuity of service. Or, provide real-life service contour maps. No doubt, Petitioner cannot and will not do this. If it had actual service—other than what it inherited from Watercom—it would wave it prominently in this proceeding, including in the Petition. Its bald assertions are evidence of failure, not success, and reveal expectations of lack of diligence by FCC staff. Mobex only speaks of customers and service on the Watercom system, not on any other license.

Petitioner took the risk, for purposes noted above, and with the understanding that when the Commission established rules for these contours, they would be less (smaller contours) than they had chosen. They had every reason to expect that the Commission would select contours the same or similar to those in the adjacent 220 MHz service when the Commission proceeded with a plan to auction AMTS spectrum across the nation, which it gave notice years ago that it would may do. Had Petitioner tried to provide more realistic coverage, it would have selected contours similar to the Contour Rules.

§80.475(a) rule Petitioner refers to was changed in the 5<sup>th</sup> R&O. It was replaced by a new paragraph, which does not have any coverage requirement. It is evident that Petitioner seeks not compliance with this rule or the 5<sup>th</sup> R&O, since it does not bother to review the new rule. Rather, its goal is as stated above: to seek to preserve the territory it obtained at risk by placement of stations and use of contours that were clearly inadequate for complying with this rule prior to its change, but were nevertheless accepted by FCC staff.

## In the Alternative: Continuity Argument Only Valid For Protection Over Water, And Depicted Contours Contradict the Argument, Etc.

In the alternative to the preceding, Petitioner, per its own Continuity argument (see preceding), cannot argue for protection over land. For example, a new AMTS licensee on the same block could provide protection to Petitioner's stations under the Contour Rules for land areas, but provide greater protection over the shipping routes Petitioner alleges to cover. By use of appropriate station placement and antenna patterns, this can be achieved. If, as Petitioner alleges, it actually wants to use the interference contours it proposes rather than those in the Contour Rules in order to maintain continuity of coverage to vessels on shipping routes, then it has no cause for concern regarding placement of new co-channel stations as long as its service to such routes is not effected.

In addition, many of the stations depicted and services described do not support this continuity argument. For example, Mobex discusses only its inherited Watercom system in terms of actual service to waterway traffic, and the maps of the Watercom stations (Exhibit II) do not show much problem: The smaller contours (the Exhibit and text are not clear, but a reader would assume they are service contours per the 5<sup>th</sup> R&O) in most cases overlap over the waterway.

seek to place stations in between these Watercom stations along this waterway, here and there where they found a gap, as depicted. That would not provide competitive coverage to the waterway or to markets. Rather, Petitioners want protection for stations in the major markets beyond what is reasonable and provided for in the Contour Rules, which is the same as in 220 MHz.

# Future Licensing via Auction Or Via Set-Asides for Public Safety and Critical Infrastructure Would be Harmed by Grant of the Petitions

Grant of the Petitions would decrease territory available to future licensing, including in major urban areas and corridors. This will decrease interest and bids in an auction, or under the Havens-Telesaurus proposal in its pending petition for reconsideration in this docket, will decrease the territory available for Public Safety and Critical Infrastructure.

### AMTS Land Service and AMTS and 220 MHz

There should not be one interference contour rule for AMTS and another for the adjacent 220 MHz. Both may provide similar services to land units. Equipment vendors, including Motorola and Microwave Data Systems, have made equipment, soon to be commercially available, that spans these two services. Licensees in and users of 220 MHz are looking to AMTS for additional spectrum to add to their 220 MHz operations. Few in the industry think that AMTS and 220 MHz will not be consolidated, either under one set of rules, or in practical operation. It would make no sense to have two differing interference contour rules as Petitioner proposes.

### <u>Petition is Moot Regarding Automatically Terminated Licenses</u> And Defective Licenses

The Petition is moot regarding licenses that did not meet the construction requirements under §1.946. Such licenses terminated automatically without Commission action in this case [§1.946(c) and §1.955(a)(2)]. Havens has presented evidence to the Commission in informal and formal filings, including with respect to the Mobex Atlantic Coast license,<sup>3</sup> demonstrating clearly, based on records in FCC files on the subject licenses, of such failure. See <u>Attachment</u> below. The evidence includes the letters sent by Mobex clearly reporting lack of construction by the deadline under the license parameters (see <u>Attachment</u> exhibits). Regardless of Commission action or inaction (including dismissal for procedural reasons of formal Havens filings), where there has been this failure, the license automatically terminates.

Operation of a terminated license violates FCC rules and should be sanctioned.

In addition, Except for the Watercom licenses of Mobex<sup>4</sup>, its other licenses never met the requirements under the rules, including for continuity of coverage and TV protection. Havens has presented informal and formal filings with evidence including with respect to Mobex's Atlantic and Pacific coast licenses<sup>5</sup>. (E.g., see <u>Attachment below.</u>)

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<sup>&</sup>lt;sup>3</sup> Havens' petition for reconsideration and subsequent application for review regarding the renewal of Mobex's Atlantic Coast License. In addition, Mobex reported that its Erie Canal license stations were not constructed by the construction deadline. These licenses were thus automatically terminated under the above-cited rules without Commission action.

<sup>&</sup>lt;sup>4</sup> For reasons Havens has given in other filings, Watercom obtained both A and B blocks only per its representation of the need for both. This need never came close to materializing. Under FCC precedent, the concession granted must be withdrawn. Watercom cannot be allowed to retain both blocks obtained under false representations. Thus, the Petition is not applicable to both blocks (For more details see footnote 11 of Havens Reply to Mobex Opposition to Petition to Deny filed on 7/27/00 regarding Mobex applications for waterways in Carolinas, Georgia, etc.).

<sup>&</sup>lt;sup>5</sup> Through the evidence presented by Havens in several filings, the Bureau has learned of licensing actions that are inconsistent with the Commission's Rules. As the Bureau stated in its Order on Further Reconsideration (see 16 FCC Rcd at 19240 released 10/31/01, pg.3, ¶6), concerning Havens' applications for the Arkansas Headwaters, when it learns of such inconsistencies "the appropriate course of action would be to consider whether it should take some action with respect to the affected license or licensee rather than to continue misapplication of such Commission Rule and/or policy."

### Seamless Coverage and Other Fallacies

Had it not gotten away with the act for so long, any objective observer would wonder how in the world Mobex expects the Commission staff to believe its repeated claims in the Petition of seamless coverage (continuity of coverage under the old §80.475(a)). In reality, it did not come close to meeting this continuity of coverage requirement—even using its excessively liberal 17 dBu contour (see above)—not when the applications were submitted and granted, not at the construction deadline, not at renewal. One need only review the FCC files of these licenses. See Attachment below. Even the maps it submits with its Petition show unmistakable huge impermissible breaks in continuity of coverage.<sup>6</sup>

In the Mobex Petition, Mobex includes an unlabelled, unexplained Exhibit II, apparently maps of Watercom system coverage. Without providing details on what the circles mean, and the methods used, these have no legitimacy<sup>7</sup>. In any case, assuming they depict at least the locations of licensed Watercom stations, what they actually show is noted above: Watercom (pre-Mobex) actually built stations to cover the licensed Waterway. Compare these maps to the maps in Exhibit III and IV of stations placed by Mobex. Their sites were obviously not selected to cover the Atlantic coast. And they obviously do not provide continuity of coverage: e.g., see the map on page 15 of Exhibit IV: only the Suffolk station provides coverage of the Atlantic

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Impermissible up until the effective date of the 5<sup>th</sup> R&O. Defects under the old §80.475(a) cannot be cured by the new one, since under the rules the subject licenses could not have been granted or renewed and thus must be terminated.

The Commission may not apply this rule to Havens (e.g., in the recent denial of his Applications for Review regarding dismissals of his applications in Texas and for the Arkansas Headwaters), and yet not apply it to the other AMTS licensees. But that is what it has done. Havens will continue to appeal this.

<sup>&</sup>lt;sup>7</sup> In addition to this, Mobex's Exhibit I has no direct connection to their licenses. The attached article reports a barge accident that occurred on the McClellan-Kerr Arkansas River Navigation System (MCKARNS) which the Watercom system does not cover and for which Mobex holds no license.

coast. The Bull Run station is far inland and barely projects (even with the theoretical F (50,50)

curves used), a signal over a small edge of the Chesapeake Bay. The Richmond station covers

no part of the Atlantic Coast or the Chesapeake Bay. Even if the Bay is considered part of the

Atlantic Coast, the Richmond site has no coverage of the Bay. Also, the overlap between the

Richmond site and the other two stations is only over land. There is no way these three sites can

be construed as providing continuity of coverage of the Atlantic Coast or this Bay or any body of

water. It is anti-competitive and grossly unfair that the FCC staff has applied with such vigor the

continuity of coverage requirement to Havens while waiving it extensively regarding Mobex, at

the same time as applying it to Havens, and before and after, providing to Mobex windfalls of

spectrum that are simply impermissible under this rule. (In addition, the Mobex applications had

other glaring defect under the rules.)

For the above reasons, the Petitions should be dismissed or denied.

Respectfully Submitted,

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September 23, 2002

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Mobex licenses: No Continuity of Coverage from Initial Application to Present Time, and Failure to Meet Construction Requirements (automatic termination)

- 1) Mobex Licenses, except for Watercom system, have never had continuity of service along the coastlines even from their initial grants. In addition, many of the sites either were untimely constructed, reported only that they "will activate" such station "on or about" a date "to begin tests to commence service", reported new, non-licensed parameters, did not provide service to the coast or had contours that barely touched the coast, and used LTR type equipment that would not allow for an "integrated" communications system.
  - a. See pending Havens Application for Review of the Mobex Atlantic Coast Renewal filed on 12/3/01 and the dismissed Havens Petition for Reconsideration of the Mobex Atlantic Coast Renewal filed 8/1/01. Some of the exhibits from these filings are attached below to illustrate above points.
    - i. Exhibit 1 shows how many of the Regionet Atlantic Coast stations were constructed untimely and that many of them involved impermissible modifications—moving of site coordinates and raising of antenna without submitting new applications and required studies. It also contains spreadsheets that show similar defects with their Pacific Coast, Great Lakes and Erie Canal licenses. From the grant dates on the Pacific Coast License it is

- also obvious that they did not have continuity of service along the coast when its original stations were granted.
- ii. Exhibit 2 page 3 clearly shows that the Regionet Atlantic Coast license, as it was originally granted, never had any continuity of service along any portion of the Atlantic Coast. Many of the stations do not touch the coast or barely touch the coast, and several represent single-site stations. Exhibit 2 also shows that the continuity of service was also not met over time up to the present.
- iii. Exhibit 3 shows that the activation notices reported construction at coordinates and antenna heights other than those licensed.
- iv. Exhibit 4 lists those Atlantic Coast stations that increased the antenna height without doing the required studies.
- v. Exhibit 5 shows that Regionet was using LTR type equipment to build out its Pacific Coast license. LTR does not meet the AMTS requirement for an integrated communications system, since LTR does not work among multiple sites.
- b. Exhibit 6: The Mobex Erie Canal License was constructed late as shown by their activation notices.
- c. Exhibit 7: Mobex's coverage map from their website even shows that they have gaps in continuity of service, even via planned coverage.
- d. Exhibit 8 shows that some of their Pacific Coast sites do not touch the
   Coast (Lake Isabella and Portland stations—granted as part of Pacific
   Coast) or barely touch the coast, at least not enough to provide real-life

- service to any vessels. In the case of the Lake Isabella site, it shows that Mobex selected sites very far inland for supposedly serving the coast (and, as noted, its contour does not touch the coast).
- 2) See exhibits 2 & 8: On page 14 of their Opposition, Mobex states, "However, our experience in the telecommunications industry leads us to conclude that any combination of factors, including advances in technology, the existence of natural barriers like mountains and trees, and old-fashioned human ingenuity render it very likely that an auction winner will serve the entire area it is purchasing, including the "dead zone" in between an incumbent's 38dBu circles." By stating this, Mobex is recognizing that the F (50,50) contours are not reliable due to terrain and other obstructions that may decrease or block signal level, thus allowing an auction winner, who uses real-life propagation models, to place sites between theirs. Mobex could have considered this when placing their sites and used a more realistic propagation model in order to space the sites. Also, if Mobex had experience enough to know that natural barriers could limit theoretical signal strength, then it is ironic that Mobex placed many of their sites farther inland, on the opposite side of coastal mountain ranges or even in the Sierra Mountains (i.e. Lake Isabella station) when trying to serve the coasts. Obviously, it is because they intended to serve land and not the coasts.

### Exhibit 1A:

# Regionet Atlantic Coast Stations WRV374

1) All of the below data was acquired from copies of the entire AMTS station files which Havens obtained from the international Transcription Service.

2) "Bolded Stations have been changed from originally licensed parameters or have been constructed late (past 11/30/00 deadline)."

3) Extension Date of 11/30/00 is per the most recent granted waiver request. This is assuming that, as stated the 1/9/98 FCC letter, Regionet was granted another year extension in 1998 and not just a waiver of the 8-month construction period because they had already attained this on 7/30/96 from FCC.

4) The stations listed as licensed 8/26/97 may have been licensed earlier. A copy of the original site license was not found in the station file.

	5) An ordinal license date for the Bichmond. VA site could not be found in the conies of AMTS files obtained from ITS
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State         Activated         Granted Until         Issued         Height ft.           VA         11/29/00         11/30/00         8/26/97         38-54-23         77-40-20         120           VA         11/29/00         11/30/00         8/26/97         38-54-23         77-40-20         120           PR         11/29/00         11/30/00         8/26/97         28-24-3         81-22-44         60           FL         11/29/00         11/30/00         8/26/97         28-24-5         81-22-44         60           NY         11/29/00         11/30/00         5/30/96         39-22-45         81-50-00         210           NY         11/29/00         11/30/00         5/30/96         40-42-18         74-00-51         750           NC         11/29/00         11/30/00         5/30/96         35-47-06         78-52-44         400           NA         11/29/00         11/30/00         5/30/96         35-47-0         78-52-44         400           FL         11/29/00         11/30/00         5/30/96         35-47-0         78-52-33         145           FL         11/29/00         11/30/00         5/30/96         35-47-0         78-58-0         175	State         Activated         Granted Until         Issued         Height It         Wattr         Height It         Wattr         Moved           VAA         11/29/00         11/29/00         11/30/00         16/30/00	State         Activated         Granted Until         Issued         Height ft.         Watte         Height ft.         Watte         Height ft.         Watte         Moved           VAA         11/29/00         11/30/00 <th>State         Activated         Granted Until         Issued         Heightift, Walfs         Walfs         Fiest         Moved           VA         11/29/00         11/30/00         Inf30/10         not available 3         37.36-52         17.40-20         120         50         257           VA         11/29/00         11/30/00         not available 3         37.36-52         17.40-20         120         50         257           FL         11/29/00         11/30/00         6/30/96         18-18-36         6-47-41         60         50         257           RV         11/29/00         11/30/00         5/30/96         19-22-48         18-00         50         27         27           NV         11/29/00         11/30/00         5/30/96         30-22-48         14         400         50         27         27           NV         11/29/00         11/30/00         5/30/96         30-02-48         14         400         50         27         201         27           NV         11/29/00         11/30/00         5/30/96         35-00-02         7-25-24         400         50         27         201         7           NV         11/29/00         11/30/00</th> <th></th> <th></th> <th>Õ</th> <th></th> <th>Date License</th> <th>Current Li</th> <th>Current License Specs Per Activation Notices  Lat   Lon   Ant.   Power   Elevation</th> <th>s Per Act Ant.</th> <th>Power F</th> <th>vation Notices Power Elevation</th> <th># ft. Antenna</th> <th>Changes Lat Secs</th> <th>Lon Secs</th> <th></th> <th>Original L Lat</th> <th>Original License Spa</th> <th>I License Spec</th>	State         Activated         Granted Until         Issued         Heightift, Walfs         Walfs         Fiest         Moved           VA         11/29/00         11/30/00         Inf30/10         not available 3         37.36-52         17.40-20         120         50         257           VA         11/29/00         11/30/00         not available 3         37.36-52         17.40-20         120         50         257           FL         11/29/00         11/30/00         6/30/96         18-18-36         6-47-41         60         50         257           RV         11/29/00         11/30/00         5/30/96         19-22-48         18-00         50         27         27           NV         11/29/00         11/30/00         5/30/96         30-22-48         14         400         50         27         27           NV         11/29/00         11/30/00         5/30/96         30-02-48         14         400         50         27         201         27           NV         11/29/00         11/30/00         5/30/96         35-00-02         7-25-24         400         50         27         201         7           NV         11/29/00         11/30/00			Õ		Date License	Current Li	Current License Specs Per Activation Notices  Lat   Lon   Ant.   Power   Elevation	s Per Act Ant.	Power F	vation Notices Power Elevation	# ft. Antenna	Changes Lat Secs	Lon Secs		Original L Lat	Original License Spa	I License Spec
VA         11/29/00         27/29/2         26.5         27 </th <th>NA         11/29/00         11/30/00         8/26/97         736-52         77-40-20         120         50         257           PR         11/29/00         11/30/00         6/39/6         18-18-36         470         50         257         270         770           FL         11/29/00         11/30/00         6/39/6         18-18-36         68-47-41         260         267         270         770           FL         11/29/00         11/30/00         5/30/6         30-22-45         18-18-36         60         27         270         77           NY         11/29/00         11/30/00         5/30/6         30-22-45         18-18-36         60         27         27         27         27           ME         11/29/00         11/30/00         5/30/6         30-22-45         18-50-00         20         27         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20</th> <th>NA         11/29/00         11/39/00         1</th> <th>VA         11/29/00         11/29/00         11/29/00         12/19/20         12/19/20         11/29/00         1</th> <th>Site City</th> <th>State</th> <th></th> <th>0</th> <th>lssued</th> <th></th> <th></th> <th>Height ft.</th> <th>Watts</th> <th>feet</th> <th></th> <th>Moved</th> <th></th> <th>_</th> <th></th> <th></th> <th>(ft.)</th>	NA         11/29/00         11/30/00         8/26/97         736-52         77-40-20         120         50         257           PR         11/29/00         11/30/00         6/39/6         18-18-36         470         50         257         270         770           FL         11/29/00         11/30/00         6/39/6         18-18-36         68-47-41         260         267         270         770           FL         11/29/00         11/30/00         5/30/6         30-22-45         18-18-36         60         27         270         77           NY         11/29/00         11/30/00         5/30/6         30-22-45         18-18-36         60         27         27         27         27           ME         11/29/00         11/30/00         5/30/6         30-22-45         18-50-00         20         27         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20         20         27         20	NA         11/29/00         11/39/00         1	VA         11/29/00         11/29/00         11/29/00         12/19/20         12/19/20         11/29/00         1	Site City	State		0	lssued			Height ft.	Watts	feet		Moved		_			(ft.)
NA   11/29/00   11/30/00   0 not available 37-36-52   77-30-56   470   50   2596   100   11/30/00   11/30/00   67/30/96   18-18-36   65-47-41   860   50   100   11/30/00   11/30/00   5/30/96   40-52-44   280   50   100   11/30/00   11/30/00   5/30/96   40-52-45   11/20-40   210   50   86   11   255   2   2   2   2   2   2   2   2	NA   11/29/00   11/30/00   0nt available 37-36-52   77-30-56   470   50   2296   700   71/29/00   11/30/00   87.68/97   28-32-21   81-12-244   280   50   100   71/29/00   11/30/00   5730/96   30-2-45   81-50-00   210   50   88   11   255   2   2   2   2   2   2   2   2	NA         11/29/00         11/30/00         for available 37-36-52         77-30-56         470         50         257         270           FL         11/29/00         11/30/00         6/39/6         18-18-36         65-47-41         60         50         3296         11           FL         11/29/00         11/30/00         8/28/97         88-32-21         18-24-4         80         50         10         11           NY         11/29/00         11/30/00         5/30/96         89-22-45         18-50-00         27         22         25         2           NC         11/29/00         11/30/00         2/1/99         38-47-06         7-6         50         80         11           NC         11/29/00         11/30/00         2/1/99         38-47-06         7-6         50         80         80         17           NC         11/29/00         11/30/00         5/30/96         34-5-28         7-6         50         10         10         10         80         80         10         10         10         10         10         10         10         10         10         10         10         10         10         10         10         10	NA         11/29/00         11/30/00         6/39/6         77-30-56         470         50         257         270           FL         11/29/00         11/30/00         6/39/6         1818-36         6-547-41         60         50         3296         11           FL         11/29/00         11/30/00         8/29/9         18-18-36         6-547-41         60         50         3296         11           NV         11/29/00         11/30/00         8/29/9         38-32-21         18-24-4         50         27         22         2           SC         11/29/00         11/30/00         5/30/96         49-2-8         14-00-51         7         27         25         2           NC         11/29/00         11/30/00         2/1/30/96         28-20-41         78-52-44         470         50         86         2         2           NC         11/29/00         11/30/00         2/30/96         38-20-42         78-52-44         470         50         86         6         2         8           NA         11/29/00         11/30/00         8/29/96         38-47-36         78-52-34         10         20         11         11         12         12	1 Manassas	٧A	11/29/00	11/30/00	8/26/97	38-54-23	77-40-20	120	20	1216				38	1-54-23	38-54-23 77-40-20	
PR         11/29/00         11/29/00         6/3/96         18-36         6/47/41         60         50         3296           FL         11/29/00         11/29/00         8/26/97         28-32-21         81-22-44         26         100           NV         11/29/00         11/29/00         5/30/96         40-42-18         13-20-0         20         27         25         2           NV         11/29/00         11/30/00         5/30/96         40-42-18         74-00-51         750         50         27         25         2           NC         11/29/00         11/30/00         5/30/96         35-20-42         76         400         50         40         40         50         40         40         50         40         50         20         7         86         10         86         86         11         86         11         86         11         11         11         11         11         11         11         11         11         11         11         11         11         11         12         12         12         12         12         12         12         12         12         12         12         12         12	PR         11/29/00         11/39/00         6/3/96         18-36         6-47-41         60         50         3296           FL         11/29/00         11/39/00         5/30/96         30-22-45         18-12-44         26         50         100           NY         11/29/00         11/39/00         5/30/96         30-22-45         81-60-01         10         25         2           SC         11/29/00         11/39/00         5/30/96         35-47-06         78-52-4         400         50         47           NC         11/29/00         11/39/00         5/30/96         35-00-02         76-59-22         86         7         86         1           NC         11/29/00         11/39/00         5/30/96         35-00-02         76-59-22         400         50         201 <td>PR         11/29/00         11/30/00         6/3/96         18-18-36         66-47-41         60         50         3296           FL         11/29/00         11/30/00         6/3/96         18-18-36         66-47-41         60         50         329           FL         11/29/00         11/30/00         5/30/96         30-22-46         18-18-36         50         27         25         2           NY         11/29/00         11/30/00         5/30/96         30-22-46         400         50         30         201         20         2           NC         11/29/00         11/30/00         5/30/96         30-22-46         400         50         30         201         2         2         2         2         2         2         2         2         2         2         2         2         3         3         3         3         4         3         4         3         4         3         4         4         3         4         4         3         4         4         3         4         4         4         4         4         4         4         4         4         4         4         4         4         4</td> <td>PR         11/29/00         11/29/20         11/29/20         11/29/20         1</td> <td>2 Richmond</td> <td>٧A</td> <td>11/29/00</td> <td>11/30/00</td> <td>not available</td> <td>37-36-52</td> <td>77-30-56</td> <td>470</td> <td>20</td> <td>257</td> <td>270</td> <td></td> <td></td> <td>37</td> <td>-36-52</td> <td>37-36-52 77-30-56</td> <td>-36-52 77-30-56 200</td>	PR         11/29/00         11/30/00         6/3/96         18-18-36         66-47-41         60         50         3296           FL         11/29/00         11/30/00         6/3/96         18-18-36         66-47-41         60         50         329           FL         11/29/00         11/30/00         5/30/96         30-22-46         18-18-36         50         27         25         2           NY         11/29/00         11/30/00         5/30/96         30-22-46         400         50         30         201         20         2           NC         11/29/00         11/30/00         5/30/96         30-22-46         400         50         30         201         2         2         2         2         2         2         2         2         2         2         2         2         3         3         3         3         4         3         4         3         4         3         4         4         3         4         4         3         4         4         3         4         4         4         4         4         4         4         4         4         4         4         4         4         4	PR         11/29/00         11/29/20         11/29/20         11/29/20         1	2 Richmond	٧A	11/29/00	11/30/00	not available	37-36-52	77-30-56	470	20	257	270			37	-36-52	37-36-52 77-30-56	-36-52 77-30-56 200
FL         11/29/00         1	FL         11/29/00         1	FL         11/29/00         1	FL   11/29/00   11/30/00   8726/97   28-82-21   81-22-44   280   50   100   11/30/00   11/30/00   8730/96   30-22-45   81-50-05   50   27   25   2   2   2   2   2   2   2   2	3 Fajardo	PR	11/29/00	11/30/00	96/2/9	18-18-36	65-47-41	09	20	3296				18	-18-36	18-18-36 65-47-41	-
NA   NA   NA   NA   NA   NA   NA   NA	NY	NY   11/29/00   11/30/00   5/30/96   40-42-45   81-50-00   210   50   88   11   25   2   2   2   2   2   2   2   2	N.   11/29/00   11/30/00   5/30/96   30-24-54   81-50-00   210   50   88   11   25   2   2   2   2   2   2   2   2	4 Orlando	교	11/29/00	11/30/00	8/26/97	28-32-21	81-22-44	280	20	100			The state of the s	28-	32-21	28-32-21 81-22-44	32-21 81-22-44 280
NY         11/29/00         11/39/00         5/30/96         40-42-18         74-00-51         750         50         27         2         25         2           SC         11/29/00         11/39/00         2/1/99         33-47-06         78-52-44         400         50         43         201	NY         11/29/00         11/29/00         11/29/00         11/29/00         11/29/00         25         2           SC         11/29/00         11/30/00         2/36/96         33-45-28         10-29-34         400         50         43           NC         11/29/00         11/30/00         5/30/96         35-50-28         70-29-3         265         62         86         1           NC         11/29/00         11/30/00         5/30/96         35-00-02         76-59-32         285         50         62         86         1           NA         11/29/00         11/30/00         5/30/96         35-20-10         76-28-03         10         201         86         1           FL         11/29/00         11/30/00         5/30/96         35-20-10         76-28-03         50         7         16         1           FL         11/29/00         11/30/00         5/30/96         35-20-10         76-28-03         50         7         16         1         1         1         1           FL         11/29/00         11/30/00         5/30/96         35-20-10         76-28-03         50         20         20         8         1         1         1	NV         11/29/00         11/39/00         11/39/00         25/30/96         49-42-18         74-00-51         750         50         27         25         2           SC         11/29/00         11/39/00         20/199         33-47-06         78-52-44         400         50         43         20/1         20/1         20/1         20/1         20/1         20/1         20/1         20/1         20/1         20/1         20/1         20/1         20/1         20/1         1/1         1/1         20/1         20/1         20/1         1/1         1/1         1/1         1/1         20/1         20/1         20/1         1/1         1/1         20/1         20/1         20/1         1/1         1/1         20/1         20/1         1/1	NY         11/29/00         11/39/00         5/30/96         40-42-18         74-00-51         750         50         27         2         3         2         3         3         3         3         3         3         3         3         3         3         4         3         4         4         4         4         4         4         4         4         4         4         4         4         4         4         4	5 Spaulding	님	11/29/00	11/30/00	5/30/96	30-22-45	81-50-00	210	20	88	11			30-	22-45	30-22-45 81-50-00	22-45 81-50-00 199
SC         11/29/00         11/39/00         2/1/89         33-47-06         78-52-44         400         50         430           NE         11/29/00         11/30/00         550-06         43-55-28         77-29-28         400         50         300           NA         11/29/00         11/30/00         5/30/96         35-40-22         28-5         10         10           PA         11/29/00         11/30/00         5/30/96         36-40-23         145         50         21           PA         11/29/00         11/30/00         5/30/96         36-41-06         7-29-28         400         50         201         86           FL         11/29/00         11/30/00         5/30/96         36-41-06         10-14-34         380         50         17         180         1           PA         11/29/00         11/30/00         8/26/97         26-41-06         8/2-44-3         360         50         20         30         20           PA         6/11/01         11/30/00         21/30/96         24-51-42         7-14-24         36         50         20         30           NY         6/11/01         11/30/00         8/26/97         21-42-23         12	SC         11/29/00         11/39/00         11/39/00         21/199         33-47-06         78-52-44         400         50         430           NE         11/29/00         11/39/00         550-00-0         56-29-32         286         400         50         300           NA         11/29/00         11/39/00         11/39/00         570/30/96         22-2-23         145         50         10           PA         11/29/00         11/39/00         573/96         38-40-0         76-28-05         175         50         201         1           PA         11/29/00         11/39/00         573/96         38-44-0         76-38-03         400         50         30         201         1           PA         11/29/00         11/39/00         573/96         38-44-0         76-38-03         400         50         201         201         7         10         1           FL         11/29/00         11/39/00         573/96         245-43         80-04-41         380         50         40         20         30         201         1         1         1         1           NA         6/11/01         11/39/00         21/30/96         245-43         72-17-5	SC         11/29/00         11/39/00         2/1/99         33-47-06         78-52-44         400         50         43           NE         11/29/00         11/39/00         53/30/96         43-55-38         70-29-28         400         50         300           FL         11/29/00         11/30/00         5/30/96         35-64-23         145         50         10           NA         11/29/00         11/30/00         5/30/96         35-64-23         145         50         201           PA         11/29/00         11/30/00         5/30/96         35-44-06         17-28-05         17         180         1           PA         11/29/00         11/30/00         5/30/96         35-44-06         17-4-24         210         50         201         1           MA         11/29/00         11/30/00         5/30/96         35-45-04         7         16         17         16           NV         6/11/01         11/30/00         5/30/96         41-45-44         7-17-15         50         50         50         90           NV         6/11/01         11/30/00         7/12/99         41-64-13         7-47-25         170         50         200 <tr< td=""><td>SC         11/29/00         11/39/00         2/1/89         33-47-06         78-52-44         400         50         430           NE         11/29/00         11/30/00         550-06         43-55-28         70-29-28         400         50         300           NA         11/29/00         11/30/00         51/30/96         35-40-20         76-29-28         400         50         30           PA         11/29/00         11/30/00         5/30/96         35-40-20         76-29-23         145         50         21           PA         11/29/00         11/30/00         5/30/96         35-40-00         76-29-23         140         50         20           FL         11/29/00         11/30/00         5/30/96         35-41-06         80-18-43         380         50         17         180         1           PA         11/29/00         11/30/00         5/30/96         25-41-06         80-18-43         380         50         17         180         1         1           NY         6/11/01         11/30/00         21/30/96         41-51-54         71-14-24         30         50         20         30         30           NY         6/11/01         11/30/0</td><td>6 New York</td><td>λN</td><td>11/29/00</td><td>11/30/00</td><td>96/08/9</td><td>40-42-18</td><td>74-00-51</td><td>750</td><td>20</td><td>27</td><td></td><td>25</td><td>2</td><td>40-4</td><td>2-43</td><td>40-42-43 74-00-49</td><td>2-43 74-00-49 1673</td></tr<>	SC         11/29/00         11/39/00         2/1/89         33-47-06         78-52-44         400         50         430           NE         11/29/00         11/30/00         550-06         43-55-28         70-29-28         400         50         300           NA         11/29/00         11/30/00         51/30/96         35-40-20         76-29-28         400         50         30           PA         11/29/00         11/30/00         5/30/96         35-40-20         76-29-23         145         50         21           PA         11/29/00         11/30/00         5/30/96         35-40-00         76-29-23         140         50         20           FL         11/29/00         11/30/00         5/30/96         35-41-06         80-18-43         380         50         17         180         1           PA         11/29/00         11/30/00         5/30/96         25-41-06         80-18-43         380         50         17         180         1         1           NY         6/11/01         11/30/00         21/30/96         41-51-54         71-14-24         30         50         20         30         30           NY         6/11/01         11/30/0	6 New York	λN	11/29/00	11/30/00	96/08/9	40-42-18	74-00-51	750	20	27		25	2	40-4	2-43	40-42-43 74-00-49	2-43 74-00-49 1673
ME         11/29/00         11/39/00         5/30/96         43-55-28         70-29-28         400         50         300         201         1           NC         11/29/00         11/30/00         5/30/96         35-00-12         7-59-32         185         50         62         86         1           NA         11/29/00         11/30/00         5/30/96         35-00-10         7-59-32         185         50         21         201         5         9           PL         11/29/00         11/30/00         5/30/96         35-20-10         7-39-32         480         50         21         201         5         9         9           FL         11/29/00         11/30/00         5/30/96         25-0-10         7-39-32         480         50         201         201         5         9         9           FL         11/29/00         11/30/00         5/30/96         25-0-14-24         210         50         201         201         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         1         2         1 <td< td=""><td>ME         11/29/00         11/39/00         5/30/96         43-55-28         70-29-28         400         50         300         201           NC         11/29/00         11/30/00         5/30/96         35-00-2         7-59-35         85         50         86         1           VA         11/29/00         11/30/00         5/30/96         35-49-00         76-28-05         175         50         21         86         1           ND         11/29/00         11/30/00         5/30/96         36-49-00         76-28-05         175         50         21         201         5         9         9           FL         11/29/00         11/30/00         5/30/96         26-44-06         76-28-05         10         201         5         9         9           FL         11/29/00         11/30/00         5/30/96         26-44-0         76-14-24         210         50         201         10         11         11         11         11         11         11         11         11         11         11         11         11         11         12         11         11         11         12         11         11         11         11         11</td><td>ME         11/29/00         11/39/00         5/30/96         43-55-28         70-29-28         400         50         300         201           NC         11/29/00         11/30/00         5/30/96         35-00-10         76-28-32         186         50         62         86         1           VA         11/29/00         11/30/00         5/30/96         36-49-00         76-28-05         175         50         21         201         5         9         9           FL         11/29/00         11/30/00         5/30/96         26-41-06         90-18-43         262         50         201         5         9         9           FL         11/29/00         11/30/00         5/30/96         26-41-06         80-18-43         262         50         201         1</td><td>ME         11/29/00         11/39/00         11/39/00         5/30/96         43-55-28         70-29-28         400         50         300         201           NC         11/29/00         11/30/00         11/30/96         35-00-10         76-29-28         456         62         86         1           VA         11/29/00         11/30/00         5/30/96         35-00-10         76-28-05         175         50         21           PA         11/29/00         11/30/00         5/30/96         25-00-10         76-28-05         50         201         5         9           PA         11/29/00         11/30/00         5/30/96         25-00-10         76-38-03         400         50         310         201         5         9         9           PA         11/29/00         11/30/00         5/30/96         25-00-10         76-14-24         210         50         201         10         1         2         1         1         1</td><td>7 Conway</td><td>SC</td><td>11/29/00</td><td>11/30/00</td><td>2/1/99</td><td>33-47-06</td><td>78-52-44</td><td>400</td><td>20</td><td>43</td><td></td><td></td><td></td><td>33-47</td><td>90-2</td><td>33-47-06 78-52-44</td><td>7-06 78-52-44 500</td></td<>	ME         11/29/00         11/39/00         5/30/96         43-55-28         70-29-28         400         50         300         201           NC         11/29/00         11/30/00         5/30/96         35-00-2         7-59-35         85         50         86         1           VA         11/29/00         11/30/00         5/30/96         35-49-00         76-28-05         175         50         21         86         1           ND         11/29/00         11/30/00         5/30/96         36-49-00         76-28-05         175         50         21         201         5         9         9           FL         11/29/00         11/30/00         5/30/96         26-44-06         76-28-05         10         201         5         9         9           FL         11/29/00         11/30/00         5/30/96         26-44-0         76-14-24         210         50         201         10         11         11         11         11         11         11         11         11         11         11         11         11         11         12         11         11         11         12         11         11         11         11         11	ME         11/29/00         11/39/00         5/30/96         43-55-28         70-29-28         400         50         300         201           NC         11/29/00         11/30/00         5/30/96         35-00-10         76-28-32         186         50         62         86         1           VA         11/29/00         11/30/00         5/30/96         36-49-00         76-28-05         175         50         21         201         5         9         9           FL         11/29/00         11/30/00         5/30/96         26-41-06         90-18-43         262         50         201         5         9         9           FL         11/29/00         11/30/00         5/30/96         26-41-06         80-18-43         262         50         201         1	ME         11/29/00         11/39/00         11/39/00         5/30/96         43-55-28         70-29-28         400         50         300         201           NC         11/29/00         11/30/00         11/30/96         35-00-10         76-29-28         456         62         86         1           VA         11/29/00         11/30/00         5/30/96         35-00-10         76-28-05         175         50         21           PA         11/29/00         11/30/00         5/30/96         25-00-10         76-28-05         50         201         5         9           PA         11/29/00         11/30/00         5/30/96         25-00-10         76-38-03         400         50         310         201         5         9         9           PA         11/29/00         11/30/00         5/30/96         25-00-10         76-14-24         210         50         201         10         1         2         1         1         1	7 Conway	SC	11/29/00	11/30/00	2/1/99	33-47-06	78-52-44	400	20	43				33-47	90-2	33-47-06 78-52-44	7-06 78-52-44 500
NC         11/29/00         1	NC   11/29/00   11/30/00   8/26/97   27-53-36   8-42-22   145   50   10   10   10   10   10   10   1	NC         11/29/00         11/39/00         1	NC         11/29/00         11/39/00         1	8 Raymond	ME	11/29/00	11/30/00	96/02/9	43-55-28	70-29-28	400	20	300	201			43-55-28	-28	-	70-29-28
FL   11/29/00   11/30/00   5/30/96   36-492-23   145   50   10	FL   11/29/00   11/30/00   5/30/96   36-49.23   145   50   10   10   10   10   10   10   1	FL   11/29/00   11/30/00   5/30/96   36-40-23   145   50   10   10   10   10   10   10   1	FL   11/29/00   11/30/00   5/30/96   36-492-23   145   50   10	9 New Bern	NC	11/29/00	11/30/00	96/08/9	35-00-02	76-59-32	285	20	62	98		-	35-00-02	9	_	76-59-33
NA         11/29/00         11/39/00         5/30/96         36-49-00         7-28-05         175         50         21         5           RID         11/29/00         11/30/00         5/30/96         39-49-01         7-28-9         9         9           FL         11/29/00         11/30/00         5/30/96         23-41-06         80-14-54         380         50         17         180         1         1           FL         11/29/00         11/30/00         8/26/97         26-45-43         80-04-41         380         50         17         180         1         1         1           MA         11/29/00         11/30/00         8/26/97         40-45-1-54         400         50         222         10         1	NA         11/29/00         11/39/00         5/30/96         36-49-00         76-28-05         175         60         21           RID         11/29/00         11/30/00         5/30/96         39-49-00         76-28-05         17         222         9         9           FL         11/29/00         11/30/00         5/30/96         39-24-1-06         80-84-3         282         50         17         180         1         1         1           PA         11/29/00         11/30/00         8/26/97         26-45-43         80-04-41         380         50         17         180         1	NA         11/29/00         11/39/00         5/30/96         36-49-00         76-28-05         175         60         21           FL         11/29/00         11/30/00         5/30/96         36-45-43         360-44-1         380         50         17         180         1         1           FL         11/29/00         11/30/00         5/30/96         36-45-43         80-04-41         380         50         17         180         1         1           PA         11/29/00         11/30/00         5/30/96         41-51-34         210         50         222         10         1	NA         11/29/00         11/39/00         5/30/96         36-49-00         7/6-28-05         175         50         21         5           FL         11/29/00         11/30/00         5/30/96         39-43-01         7         222         9         9           FL         11/29/00         11/30/00         5/30/96         39-45-10         80-04-41         380         50         17         180         1         1           FL         11/29/00         11/30/00         8/26/97         26-45-43         80-04-41         380         50         17         180         1         1         1           MA         11/29/00         11/30/00         8/26/97         40-45-1-54         400         50         222         10         1	10 Clearwater	F	11/29/00	11/30/00	8/26/97	27-53-35	82-42-23	145	20	10				27-53-35	35		35 82-42-23 180
MD         11/29/00         11/29/00         11/29/00         5/30/96         39-20-10         76-39-03         400         50         310         201         5         9           FL         11/29/00         11/30/00         8/30/96         25-41-43         80-44-43         380         50         7         222         9         9           FL         11/29/00         11/30/00         8/26/97         40-02-30         75-14-24         210         50         222         10         1         2         1	MBD   11/29/00   11/30/00   5/30/96   25-47-10   76-39-03   400   50   310   520   5   5   5   5   5   5   5   5   5	MBD   11/29/00   11/30/00   5/30/96   25-41-42   20   50   310   201   5   5   9   9   1/29/00   11/30/00   5/30/96   25-41-42   210   50   7   222   9   9   9   1/29/00   11/30/00   5/30/96   25-41-42   210   50   222   10   1   12   10   1   1/29/00   11/30/00   21/30/96   41-51-42   210   50   222   10   1   1   1   1   1   1   1   1	MBD   11/29/00   11/30/00   5/30/96   25-41-0   76-39-03   400   50   310   50   50   50   50   50   50   50	11 Suffolk	٧A	11/29/00	11/30/00	96/08/9	36-49-00	76-28-05	175	20	21				36-49-00	8		00 76-28-05 199
FL         11/29/00         11/39/00         1	FL         11/29/00         11/39/00         5/30/96         25-41-06         80-18-54.3         282         50         7         222         9         9           PA         11/29/00         11/39/00         8/26/97         26-41-06         80-18-54.3         260         7         180         1         1         1           MA         11/29/00         11/39/00         11/39/00         8/26/97         26-41-06         80-44.1         380         50         10         1         1         1           CT         6/11/01         11/39/00         11/39/00         11/39/00         11/39/00         11/39/00         1	FL	FL   11/29/00   11/30/00   8/26/97   26-44-06   80-18-54.3   282   50   7   120	12 Baltimore	MD	11/29/00	11/30/00	96/30/96	39-20-10	76-39-03	400	20	310	201	2		39-20-05	05		76-39-03
FL 11/29/00   11/30/00   8/26/97   26-45-43   80-04-41   380   50   177   180   1   1   1   1   1   1   1   1   1	FL 11/29/00   11/30/00   8/26/97   26-45-43   80-04-41   380   50   177   180   1   1   1   1   1   1   1   1   1	FL   11/29/00   11/30/00   81/26/97   26-45-43   80-04-41   380   50   177   180   1   1   1   1   1   1   1   1   1	FL	13 Miami	F	11/29/00	11/30/00	5/30/96	25-41-06	80-18-54.3	282	20	7	222	6	6	25-41-15	15	_	15 80-19-03 60
PA         11/29/00         11/39/00         1	PA         11/29/00         11/39/00         1	PA         11/29/00         11/39/00         8/26/97         4-0-02-30         75-14-24         210         50         220         10         1         12           RMA         11/29/00         11/30/00         5/30/36         41-5-24         71-17-15         60         201         1         1         12           NY         6/11/01         11/30/00         2/12/99         41-04-13         73-47-25         170         50         605         80	PA         11/29/00         11/39/00         8/26/97         40-02-30         75-14-24         210         50         220         10         1         12           CT         6/11/01         11/39/00         5/30/366         41-67-53         75-14-24         71-17-15         400         50         201         1         12           NY         6/11/01         11/39/00         7/12/99         41-65-23         75-25-3         170         50         605         201         1         1           NV         6/11/01         11/30/00         7/12/99         41-65-73         73-47-25         170         50         605         20         1	onia Park	F	11/29/00	11/30/00	8/26/97	26-45-43	80-04-41	380	20	17	180	-	-	26-45-42	12	-	12 80-04-42 200
MA         11/29/00         11/39/00         5/30/96         41-51-54         71-17-15         400         50         201         201           CT         6/11/01         11/30/00         2/10/00         41-25-72         72-57-06         50         640         20           NV         6/11/01         11/30/00         7/12/299         40-56-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/299         40-56-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/299         40-56-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/299         40-56-04         74-13-22         170         50         810           NV         6/11/01         11/30/00         2/1/99         34-56-4         76-25-07         70         50         810           NJ         1/30/01         11/30/00         2/1/99         32-48-14         78-57-25         30         50         7         7           GA         1/30/01         11/30/00         2/1/99         32-48-14         78-56-07         30	MA   11/29/00   11/30/00   2/30/96   41-51-54   71-17-15   400   50   201	MA         11/29/00         11/39/00         11/39/00         41-51-54         71-17-15         400         50         201         201           CT         6711/01         11/30/00         271/00         41-55-73         72-57-05         50         640         20           NV         6711/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NV         6711/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NA         6711/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NA         6711/01         11/30/00         7/19/99         40-50-04         72-50-07         70         80           SC         1/30/01         11/30/00         2/1/99         32-44-50         190         50         26         70           A         1/30/01         11/30/00         2/1/99         32-44-50         190         50         35         7         1         1           BA         1/30/01         11/30/00         2/1/99         32-48-07         75-36-07         30         50 <td>MA         11/29/00         11/39/00         5/30/96         41-51-54         71-17-15         400         50         201         201           CT         6/11/01         11/30/00         2/10/00         41-52-72         72-57-06         50         640         20           NV         6/11/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         810           NU         1/30/01         11/30/00         2/1/99         32-44-14         79-57-25         300         50         17           GA         1/30/01         11/30/00         2/1/99         32-44-22         81-04-44         250         50<!--</td--><td>lelphia</td><td>PA</td><td>11/29/00</td><td>11/30/00</td><td>8/26/97</td><td>40-02-30</td><td>75-14-24</td><td>210</td><td>20</td><td>222</td><td>10</td><td>-</td><td>12</td><td>40-02-31</td><td>=</td><td>-</td><td>11 75-14-12 200</td></td>	MA         11/29/00         11/39/00         5/30/96         41-51-54         71-17-15         400         50         201         201           CT         6/11/01         11/30/00         2/10/00         41-52-72         72-57-06         50         640         20           NV         6/11/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         620           NV         6/11/01         11/30/00         7/12/99         40-50-04         74-13-22         170         50         810           NU         1/30/01         11/30/00         2/1/99         32-44-14         79-57-25         300         50         17           GA         1/30/01         11/30/00         2/1/99         32-44-22         81-04-44         250         50 </td <td>lelphia</td> <td>PA</td> <td>11/29/00</td> <td>11/30/00</td> <td>8/26/97</td> <td>40-02-30</td> <td>75-14-24</td> <td>210</td> <td>20</td> <td>222</td> <td>10</td> <td>-</td> <td>12</td> <td>40-02-31</td> <td>=</td> <td>-</td> <td>11 75-14-12 200</td>	lelphia	PA	11/29/00	11/30/00	8/26/97	40-02-30	75-14-24	210	20	222	10	-	12	40-02-31	=	-	11 75-14-12 200
CT         6/11/01         11/30/00         2/10/00         41-25-23         72-57-66         365         6/40         20           NY         6/11/01         11/30/00         7/12/299         41-66-04         74-12-22         170         50         660           NV         6/11/01         11/30/00         7/12/299         40-56-04         74-12-22         170         50         620           NV         6/11/01         11/30/00         7/12/299         40-56-04         74-12-22         170         50         810           NC         1/30/01         11/30/00         2/1/99         40-56-47         78-00-42         86         50         299           NC         1/30/01         11/30/00         2/1/99         40-56-47         78-00-42         80         26           SC         1/30/01         11/30/00         2/1/99         40-13-31         72-45-47         190         50         340         70           SC         1/30/01         11/30/00         2/1/99         32-49-14         79-57-25         300         50         7         1           MA         7/90/14         11/30/00         11/30/00         11/30/00         11/30/00         11/30/00         11	CT         6/11/01         11/30/00         2/10/00         41-25-23         72-57-06         365         6/40         20           NY         6/11/01         11/30/00         7/12/299         41-04-13         7/3-47-22         170         50         605           NY         6/11/01         11/30/00         7/12/299         40-65-31         73-01-34         95         50         299           NC         1/30/01         11/30/00         7/12/299         40-55-31         73-01-34         95         80         29           NC         1/30/01         11/30/00         2/1/99         40-55-31         75-01-34         95         80         29           NL         1/30/01         11/30/00         2/1/99         40-55-47         75-5-07         170         50         810         20           SC         1/30/01         11/30/00         2/1/99         32-49-14         79-57-25         300         50         17         1           DE         1/30/01         11/30/00         2/1/99         32-49-14         75-36-07         30         50         37         1           MA         reported as not constructed         reported as not constructed         reported as not constructed <td>CT         6/11/01         11/30/00         2/10/00         41-25-23         72-57-36         365         50         640         20           NY         6/11/01         11/30/00         7/12/99         41-04-13         73-47-25         170         50         505           NA         6/11/01         11/30/00         7/12/99         40-56-31         73-01-34         95         50         299           PA         6/11/01         11/30/00         7/12/99         40-56-31         73-01-34         95         50         299           NA         1/30/01         11/30/00         2/1/99         40-56-31         73-01-34         95         50         299           NA         1/30/01         11/30/00         2/1/99         34-54-4         76-57-57         170         50         810           SC         1/30/01         11/30/00         2/1/99         32-49-14         76-57-25         300         50         26           A         1/30/01         11/30/00         2/1/99         32-49-14         75-36-07         30         50         37           DE         7/30/1         11/30/00         11/30/00         11/30/00         11/30/00         11/30/00         11/30/00&lt;</td> <td>CT         6/11/01         11/30/00         2/19/00         41-25-23         72-57-66         365         640         20           NY         6/11/01         11/30/00         7/12/299         41-60-41         7/12/22         170         50         605           NV         6/11/01         11/30/00         7/12/299         40-50-41         7/12/22         170         50         620           NV         6/11/01         11/30/00         7/12/299         40-50-41         7/2-1/34         95         50         299           NC         1/30/01         11/30/00         7/12/99         40-50-42         7/2-2-07         170         50         810           NC         1/30/01         11/30/00         2/1/99         32-44-57         190         50         340         70           SC         1/30/01         11/30/00         2/1/99         32-44-57         190         50         37         6         26           MA         1/30/01         11/30/00         2/1/99         32-44-14         75-36-07         30         50         35-1         6         26           CT         1/30/01         11/30/00         2/1/99         33-49-17         75-36-07         30</td> <td>beth</td> <td>MA</td> <td>11/29/00</td> <td>11/30/00</td> <td>2/30/96</td> <td>41-51-54</td> <td>71-17-15</td> <td>400</td> <td>20</td> <td>210</td> <td>201</td> <td></td> <td></td> <td>41-51-54</td> <td>4</td> <td>-</td> <td>71-17-15</td>	CT         6/11/01         11/30/00         2/10/00         41-25-23         72-57-36         365         50         640         20           NY         6/11/01         11/30/00         7/12/99         41-04-13         73-47-25         170         50         505           NA         6/11/01         11/30/00         7/12/99         40-56-31         73-01-34         95         50         299           PA         6/11/01         11/30/00         7/12/99         40-56-31         73-01-34         95         50         299           NA         1/30/01         11/30/00         2/1/99         40-56-31         73-01-34         95         50         299           NA         1/30/01         11/30/00         2/1/99         34-54-4         76-57-57         170         50         810           SC         1/30/01         11/30/00         2/1/99         32-49-14         76-57-25         300         50         26           A         1/30/01         11/30/00         2/1/99         32-49-14         75-36-07         30         50         37           DE         7/30/1         11/30/00         11/30/00         11/30/00         11/30/00         11/30/00         11/30/00<	CT         6/11/01         11/30/00         2/19/00         41-25-23         72-57-66         365         640         20           NY         6/11/01         11/30/00         7/12/299         41-60-41         7/12/22         170         50         605           NV         6/11/01         11/30/00         7/12/299         40-50-41         7/12/22         170         50         620           NV         6/11/01         11/30/00         7/12/299         40-50-41         7/2-1/34         95         50         299           NC         1/30/01         11/30/00         7/12/99         40-50-42         7/2-2-07         170         50         810           NC         1/30/01         11/30/00         2/1/99         32-44-57         190         50         340         70           SC         1/30/01         11/30/00         2/1/99         32-44-57         190         50         37         6         26           MA         1/30/01         11/30/00         2/1/99         32-44-14         75-36-07         30         50         35-1         6         26           CT         1/30/01         11/30/00         2/1/99         33-49-17         75-36-07         30	beth	MA	11/29/00	11/30/00	2/30/96	41-51-54	71-17-15	400	20	210	201			41-51-54	4	-	71-17-15
NY         6/11/01         11/30/00         7/12/99         41-04-13         73-47-25         170         50         505           NJ         6/11/01         11/30/00         7/12/99         40-56-14         74-13-22         170         50         620           NA         6/11/01         11/30/00         7/12/99         40-56-14         73-13-4         95         50         299           PA         6/11/01         11/30/00         7/12/99         40-56-31         73-01-34         95         50         299           NL         1/30/01         11/30/00         2/1/99         34-15-07         170         50         810         70           SC         1/30/01         11/30/00         2/1/99         34-15-07         190         50         26         17           GA         1/30/01         11/30/00         2/1/99         32-44-27         190         50         37         1           MA         1-ported as not constructed         1/30/01         1/30/01         1/130/00         1/20/30         1/20/30         1         1           CT         1-ported as not constructed         1/20/20         1/20/20         1/20/20         1/20/20         1/20/20         1/20/20<	NY         6/11/01         11/30/00         7/12/99         41-04-13         73-47-25         170         50         505           NJ         6/11/01         11/30/00         7/12/99         40-56-31         73-01-34         95         50         620           NA         6/11/01         11/30/00         7/12/99         40-56-31         73-01-34         95         50         299           NA         6/11/01         11/30/00         7/12/99         40-56-31         73-01-34         95         50         810         2           NU         1/30/01         11/30/00         2/1/99         40-56-31         7-25-07         170         50         810         2           SC         1/30/01         11/30/00         2/1/99         40-13-31         74-24-57         190         50         36         36           SC         1/30/01         11/30/00         2/1/99         32-49-14         75-36-07         30         50         37         7           MA         1/30/01         11/30/00         7/1/99         32-49-14         75-36-07         30         50         37         1         1         1           CT         reported as not constructed         RA <td>NY         6/11/01         11/30/00         7/12/99         41-04-13         73-47-25         170         50         505           NJ         6/11/01         11/30/00         7/12/99         40-56-31         73-01/34         95         50         620           NA         6/11/01         11/30/00         7/12/99         40-56-31         73-01/34         95         50         299           NA         6/11/01         11/30/00         7/12/99         40-56-31         73-01/34         95         50         810         2           NJ         1/30/01         11/30/00         2/1/99         40-53-54         75-25-07         170         50         810         7           SC         1/30/01         11/30/00         2/1/99         40-153-25         7         170         50         810         7           SC         1/30/01         11/30/00         2/1/99         32-49-14         78-00-42         30         50         37         1         1         1           MA         reported as not constructed         RA         reported as not constructed         RA         1         1         1         1         1           FL         reported as not constructed</td> <td>NY         6/11/01         11/30/00         7/12/99         41-04-13         73-47-25         170         50         505           NJ         6/11/01         11/30/00         7/12/99         40-50-41         73-47-25         170         50         620           NA         6/11/01         11/30/00         7/12/99         40-50-31         73-01-34         95         50         299           PA         6/11/01         11/30/00         7/12/99         40-50-31         73-01-34         95         50         299           NU         1/30/01         11/30/00         2/1/99         34-15-04         78-00-42         300         50         26         7           SC         1/30/01         11/30/00         2/1/99         34-15-04         78-00-42         300         50         26         7           SC         1/30/01         11/30/00         2/1/99         32-04-22         81-04-44         250         50         7         7         1         1           DE         7/90/1         11/30/00         2/1/99         32-04-22         81-04-44         250         351         6         26           CT         reported as not constructed         FL         rep</td> <td>en</td> <td>CT</td> <td>6/11/01</td> <td>11/30/00</td> <td>2/10/00</td> <td>41-25-23</td> <td>72-57-06</td> <td>365</td> <td>20</td> <td>640</td> <td>20</td> <td></td> <td></td> <td>41-25-23</td> <td>m</td> <td>_</td> <td>3 72-57-06 345</td>	NY         6/11/01         11/30/00         7/12/99         41-04-13         73-47-25         170         50         505           NJ         6/11/01         11/30/00         7/12/99         40-56-31         73-01/34         95         50         620           NA         6/11/01         11/30/00         7/12/99         40-56-31         73-01/34         95         50         299           NA         6/11/01         11/30/00         7/12/99         40-56-31         73-01/34         95         50         810         2           NJ         1/30/01         11/30/00         2/1/99         40-53-54         75-25-07         170         50         810         7           SC         1/30/01         11/30/00         2/1/99         40-153-25         7         170         50         810         7           SC         1/30/01         11/30/00         2/1/99         32-49-14         78-00-42         30         50         37         1         1         1           MA         reported as not constructed         RA         reported as not constructed         RA         1         1         1         1         1           FL         reported as not constructed	NY         6/11/01         11/30/00         7/12/99         41-04-13         73-47-25         170         50         505           NJ         6/11/01         11/30/00         7/12/99         40-50-41         73-47-25         170         50         620           NA         6/11/01         11/30/00         7/12/99         40-50-31         73-01-34         95         50         299           PA         6/11/01         11/30/00         7/12/99         40-50-31         73-01-34         95         50         299           NU         1/30/01         11/30/00         2/1/99         34-15-04         78-00-42         300         50         26         7           SC         1/30/01         11/30/00         2/1/99         34-15-04         78-00-42         300         50         26         7           SC         1/30/01         11/30/00         2/1/99         32-04-22         81-04-44         250         50         7         7         1         1           DE         7/90/1         11/30/00         2/1/99         32-04-22         81-04-44         250         351         6         26           CT         reported as not constructed         FL         rep	en	CT	6/11/01	11/30/00	2/10/00	41-25-23	72-57-06	365	20	640	20			41-25-23	m	_	3 72-57-06 345
N.J.         6/11/01         11/30/00         7/12/99         40-56-04         74-13-22         170         50         620           NY         6/11/01         11/30/00         7/12/99         40-56-04         74-13-22         170         50         620           NC         1/30/01         11/30/00         7/12/99         40-56-04         75-01-34         95         50         299           NJ         1/30/01         11/30/00         2/1/99         40-53-54         75-00-42         300         50         26         70           SC         1/30/01         11/30/00         2/1/99         32-44-14         78-57-25         300         50         17         70           GA         1/30/01         11/30/00         2/1/99         32-44-12         81-04-44         250         50         17         1           MA         reported as not constructed         11/30/00         7/19/99         33-44-07         78-36-07         30         50         37         1           CT         reported as not constructed         17/20/99         35-48-28         81-04-44         250         50         37         1           CT         reported as not constructed         17/20/90	NV         6/11/01         11/30/00         7/12/299         40-56-04         74-13-22         170         50         620           PA         6/11/01         11/30/00         7/12/299         40-56-31         73-01-34         95         50         299         7           NC         1/30/01         11/30/00         7/12/299         40-56-31         73-01-34         95         50         299         7           NU         1/30/01         11/30/00         2/1/99         40-56-31         78-00-42         300         50         26         26         70	N.V.         6/11/01         11/30/00         7/12/99         40-56-04         74-13-22         170         50         620           NY         6/11/01         11/30/00         7/12/99         40-56-17         73-01-34         95         50         299           PA         6/11/01         11/30/00         7/12/99         40-55-17         73-01-34         95         50         299           NL         1/30/01         11/30/00         2/1/99         40-55-47         75-56-07         170         50         810         7           SC         1/30/01         11/30/00         2/1/99         34-15-04         79-04-32         190         50         26         7           GA         1/30/01         11/30/00         2/1/99         32-04-22         81-04-44         250         351         7         1           DE         7/90/1         11/30/00         2/1/99         32-04-22         81-04-44         250         351         6         26           MA         reported as not constructed         11/30/00         2/1/99         33-48-07         75-36-07         30         50         351         8         6         26           CT         reported as not constructe	NV         6/11/01         11/30/00         7/12/99         40-56-04         7/43-22         170         50         620           NY         6/11/01         11/30/00         7/12/99         40-56-04         7/4-13-2         170         50         629         2           PA         6/11/01         11/30/00         7/12/99         40-55-74         75-01-34         95         50         299         2           NL         1/30/01         11/30/00         2/1/99         40-55-47         75-57-07         170         50         80         26         70	18 Valhalla	Ν	6/11/01	11/30/00	7/12/99	41-04-13	73-47-25	170	20	505				41-04-1	3	-	3 73-47-25 172
NY   6/11/01   11/30/00   7/12/99   40-56-31   73-01-34   95   50   299   29	NY   6/11/01   11/30/00   7/12/99   40-50-31   73-01-34   95   50   299   29	NY   6/11/01   11/30/00   7/12/299   40-56-31   73-01-34   95   50   299   2	NY   6/11/01   11/30/00   7/12/99   40-56-31   73-01-34   95   50   299   299   296   299   20-56-31   73-01-34   95   50   299   296	19 Verona	S	6/11/01	11/30/00	7/12/99	40-50-04	74-13-22	170	20	620				40-50-04	4	_	4 74-13-22 200
PA         6/11/01         11/30/00         7/12/99         40-35-54         75-25-07         170         50         810           NC         1/30/01         1/13/00         2/1/99         34-16-47         70         50         26           SC         1/30/01         1/13/00         2/1/99         32-49-14         79-57-25         300         50         17           DE         7/30/01         1/13/00         2/1/99         32-49-14         79-57-25         300         50         17           MA         reported as not constructed         1/13/00         7/12/99         39-48-07         75-36-07         30         50         35-1         6         26           CT         reported as not constructed         reported as not constructed         4-4-4-7         75-36-07         30         50         35-1         6         26           CT         reported as not constructed         5-4-4-7         75-36-07         30         50         35-1         6         26           CT         reported as not constructed         5-4-4-7         75-36-07         30         50         35-1         6         26	PA         6/11/01         11/30/00         7/12/99         40-35-54         75-25-07         170         50         810           NC         1/30/01         1/130/00         2/1/99         34-16-44         79-00-42         80         26         17         70	NC   11/30/00   11/30/00   21/1299   40-35-54   75-25-07   170   50   810	PA         61/1001         11/30/00         7/12/99         40-35-54         75-25-07         170         50         810           NC         1/30/01         1/13/00         21/199         34-16-47         190         50         26           SC         1/30/01         1/13/00         21/199         32-49-14         79-57-25         300         50         17           DE         7/30/01         1/13/00         21/199         32-49-14         79-57-25         300         50         17           MA         reported as not constructed         CT         reported as not constructed         As not constructed         As not constructed           FL         reported as not constructed         FL         reported as not constructed           FL         reported as not constructed         As not constructed           FL         reported as not constructed	20 Selden	λ	6/11/01	11/30/00	7/12/99	40-50-31	73-01-34	92	20	299			2	40-50-3	-		1 73-01-36 161
NC   1/30/01   11/30/00   2/1/99   34-15-04   78-00-42   300   50   26	NC         1/30/01         11/30/00         2/1/99         34-15-04         78-00-42         300         50         26         26         70	NC         1/30/01         11/30/00         2/1/99         34-15-04         78-00-42         300         50         26         26         70	NC 1/30/01   11/30/00   21/199   34-15-04   78-00-42   300   50   26   26   26   26   26   26   26   2	21 Allentown	PA	6/11/01	11/30/00	7/12/99	40-35-54	75-25-07	170	20	810				40-35-5	4	-	4 75-25-07 217
N.J. 1/30/01   11/30/00   21/199   40-13-31   74-24-57   190   50   340   70   70   70   70   70   70   70	NJ 1/30/01   11/30/00   21/199   40-13-31   74-24-57   190   50   340   70	Nu	Nu	ssa	SC	1/30/01	11/30/00	2/1/99	34-15-04	78-00-42	300	20	56				34-15-0	4	-	4 78-00-42 300
SC         1/30/01         11/30/00         2/1/99         32-48-14         79-57-25         300         60         177         7         7           GA         1/30/01         1/130/00         2/1/99         32-04-22         81-04-44         250         50         7         1	Sc   1/30/01   11/30/00   21/199   32-49-14   79-57-25   300   50   17	Sc   1/30/01   11/30/00   21/199   32-49-14   79-57-25   300   50   17	Sc 1/30/01   11/30/00   21/199   32-48-14   79-57-25   300   50   17	23 Perrinville	S	1/30/01	11/30/00	2/1/99	40-13-31	74-24-57	190	20	340	70			40-13-3	-	-	1 74-24-57 120
GA 1/30/01   11/30/00   2/1/99   32-04-22   81-04-44   250   50   7   1   1   1   1   1   1   1   1   1	CSA 1/30/01   11/30/00   21/189   32-04-22   81-04-44   250   50   7	CSA 1/30/01   11/30/00   21/199   32-04-22   81-04-44   250   50   7   1   1   1   1   1	GA 1/30/01   11/30/00   2/1/99   32-04-22   81-04-44   250   50   7   1   1   1   1   1   1   1   1   1	24 Charleston	SC	1/30/01	11/30/00	2/1/99	32-49-14	79-57-25	300	20	17				32-49-1	4		4 79-57-25 300
DE 7/8/01   11/30/00   7/12/99   39-48-07   75-36-07   30   50   351   6   26   8	DE 7/9/01   11/30/00   7/12/99   39-48-07   75-36-07   30   50   351   6   26   8	DE         7/8/01         11/30/00         7/12/299         39-48-07         75-36-07         30         50         351         6         26           MA         reported as not constructed         CT         reported as not constructed         A         FL         reported as not constructed           NJ         reported as not constructed         FL         reported as not constructed           FL         reported as not constructed           FL         reported as not constructed	DE 7/8/01   11/30/00   7/12/99   39-48-07   75-36-07   30   50   351   6   26     MA reported as not constructed   CT reported as not constructed   NJ reported as not constructed   FL reported   FL reported	25 Savannah	GA	1/30/01	11/30/00	2/1/99	32-04-22	81-04-44	250	20	7		-	-	32-04-2	-	-	1 81-04-45 300
MA reported as not constructed CT reported as not constructed CT reported as not constructed NJ reported as not constructed NJ reported as not constructed	MA reported as not constructed CT reported as not constructed CT reported as not constructed NJ reported as not constructed FL reported as not constructed FL reported as not constructed	MA reported as not constructed CT reported as not constructed CT reported as not constructed NJ reported as not constructed FL reported as not constructed FL reported as not constructed FL reported as not constructed	MA reported as not constructed CT reported as not constructed CT reported as not constructed NJ reported as not constructed FL reported as not constructed	26 Winterthur	DE	7/9/01	11/30/00	7/12/99	39-48-07	75-36-07	30	20	351		9	26	39-48-0	-	$\vdash$	1 75-35-41 200
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### Exhibit 1B, page 1:

32-35-54 | 116-50-35 | 20 | 34-20-55 | 119-19-57 | 167 | 46-40-45 | 122-50-31 | 400 | 34-19-41 | 118-35-48 | 130 | 34-20-50 | 118-135-48 | 130 | 32-20-39 | 116-24-54 | 50 | 32-20-39 | 116-24-54 | 50 | 36-20-47 | 118-25-58 | 55 | 32-50-31 | 16-25-58 | 55 | 32-50-31 | 16-25-58 | 55 | 32-50-31 | 117-38-49 | 40 | 32-25-47 | 118-44-56 | 100 | 32-25-47 | 118-44-56 | 100 | 32-25-47 | 118-44-56 | 100 | 32-25-47 | 118-44-56 | 100 | 32-25-47 | 118-44-56 | 100 | 32-25-47 | 118-44-56 | 100 | 32-25-47 | 118-44-56 | 100 | 32-25-47 | 118-44-56 | 100 | 32-25-47 | 118-44-56 | 100 | 32-25-47 | 118-44-56 | 100 | 32-25-51 | 117-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 | 80 | 17-32-26 43-22-00 123-04-00 100 45-07-52 122-17-28 120 43-30-15 128-528 180 33-47-48 117-37-22 50 34-05-05 118-12-10 40 34-08-18 117-48-46 44 33-36-07 117-20-35 120 35-23-41 120-42-25 100 43-32-55 123-05-10 120 32-50-20 117-14-56 34-31-36 119-58-39 44-00-07 123-06-53 45-31-56 122-44-48 17-32-57 122-47-02 33-42-39 117-32-01 38-24-32 122-06-34 120-24-07 36-18-14 34-20-00 Impermissible Changes # ft. Anteni Lat Secs Lon Secs Raised Moved Moved NOTES:
"" denotes that notice did not contain FCC date-stamp. Could be other activation date
"" denotes that notice did not contain FCC date-stamp. Could be other activation date
"" denotes that notice did not contain Team they weren't granted one, just not found in station file
Bolded Stations have been changed from originally licensed parameters or have been constructed late w/o FCC approval or waiver
Bolded Stations have been changed from originally licensed parameters or have been constructed tate wo FCC approval or waiver
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7/1/94
2/14/95 none found 1/28/95\* none found 9/29/99 & 1/7/9 none found 1/7/95 none found 1/7/95\* none found Extension Built Date Reported Late Activated G none found none found 5/29/9 due 38 Excelon (39 Exercision (40 Santa Margarita (41 Cottage Grove (42 Glendale (42 Glendale (44 Woodburn (44 Woodburn (45 Seattle (47 E Seattle (48 Pornona (48 Porn 2 Mt. Wilson 3 San Diego 4 Santa Barbara Site City

### Exhibit 1B, page 2:

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		122-59-08			122-41-40	123-07-20	122-2	122-5	121-50-31		123-08-17
		44-11-51			45-29-20	44-50-48	45-40-33 122-22-33	6-03-18	37-06-39		46-58-22
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49 VISTA	50 AS	51 Eugene	52 Hi	53 Ph	54 Pc	55 Salem	56 Camas	57 Rainier	58 Lo	59 We	60 01

### Exhibit 1C:

Regionet Great Lakes Stations Call Signs KUF732, KPB531, KCE278

\*\*Bolded Stations have been changed from originally licensed parameters or have been constructed late w/o FCC approval or waiver\*\*
All current data on these sites was taken from the station activation notices submitted to the FCC by Regionet

	ev.	eet	732	685	851	950	620	680	580	950	577	1340	803	792	1585
	Power Elev.	Natts F	20	20	20	20	20	20	50	20	50	20	50	20	20
		Ant. Height (Watts Feet	190	190	185	190	190	190	190	190	190	190	190	190	200
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	Original Li	Lat	42-30-36 87-53-11	42-28-58	41-40-07	45-23-53	43-05-48	43-08-07	41-41-02	-	43-01-48	42-02-20	45-39-45	43-18-34	42-56-42
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	Power Elev.	Watts feet	20	20	20	20	20	20	20	20	20	20	20	20	20
	Ant.	feet	270	300	185	140	250	190	100	270	300	225	150	45	140
40		Lon	87-53-18	83-12-19	86-48-21	83-55-19	87-54-19	77-35-08	83-24-31	81-43-06	78-55-15	80-03-45	84-38-15	85-54-37	76-01-45
	CurrentP	Lat	7/14/98 42-30-56 87-53-18	7/14/98 42-28-58 83-12-19	7/14/98 41-40-07	7/14/98 45-23-53	7/14/98 43-05-48  87-54-19	7/14/98 43-08-09 77-35-08	7/14/98 41-41-22 83-24-31	7/14/98 41-22-27	7/14/98 43-01-48 78-55-15	7/14/98 42-02-20	7/14/98 45-39-45	7/14/98 43-18-23	1/5/99 42-56-46   76-01-45
	Date License CurrentPer Notices	Issued	7/14/98	7/14/98	7/14/98	7/14/98	7/14/98	7/14/98	7/14/98	7/14/98	7/14/98	7/14/98	7/14/98	7/14/98	1/5/99
	Extension	Granted Until	7/14/01	1/14/01	7/14/01	7/14/01	7/14/01	7/14/01	7/14/01	7/14/01	7/14/01	7/14/01	7/14/01	7/14/01	7/14/01
	o	Activated	6/11/01	6/11/01	6/11/01	6/11/01	7/10/01	6/22/01	6/22/01	6/22/01	6/22/01	6/22/01	6/22/01	6/15/01	6/11/01
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		Site City	1 Kenosha	2 Detroit	≥	4 Rogers City	5 Milwaukee	6 Rochester	7 Toledo	8 Cleveland	9 Buffalo	rie	11 Charlevoix	12 Muskegon	13 Syracuse
		is #	1 K	2 D(	3	4 R	2 M	6 Rc	7 Tc	8	9 B(	10 Erie	1100	12 M	13 8)

### Exhibit 1D:

# Regionet Erie Canal and Hudson River Stations Call Sign KCE240

\*\*Bolded Stations have been changed from originally licensed parameters or have been constructed late w/o FCC approval or waiver\*\*
All current data on these sites was taken from the station activation notices submitted to the FCC by Regionet
The Syracuse site is not listed under KCE240, but is required to meet the AMTS coverage requirement for the Erie Canal/Hudson River System

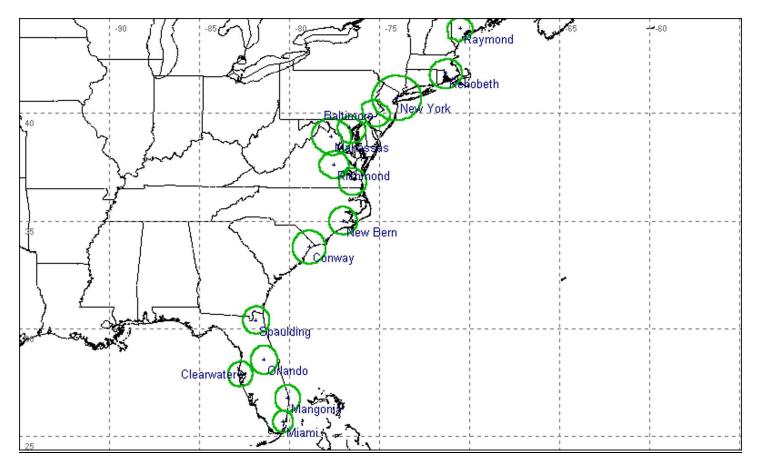
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		Date Reported	Extension	Date License Cu	IrrentP	CurrentPer Notices Ant.	Ant.	Power	Elevation	# ft. Antenr Lat
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2 Albany	λ	8/2/01	7/14/01	2/1/99 42-47-08 73-37-44	-47-08	73-37-44	200	202		
3 Syracuse	Ν	6/11/01	7/14/01	1/5/99 42-	-56-46	1/5/99 42-56-46 76-01-45			-	

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### Exhibit 2

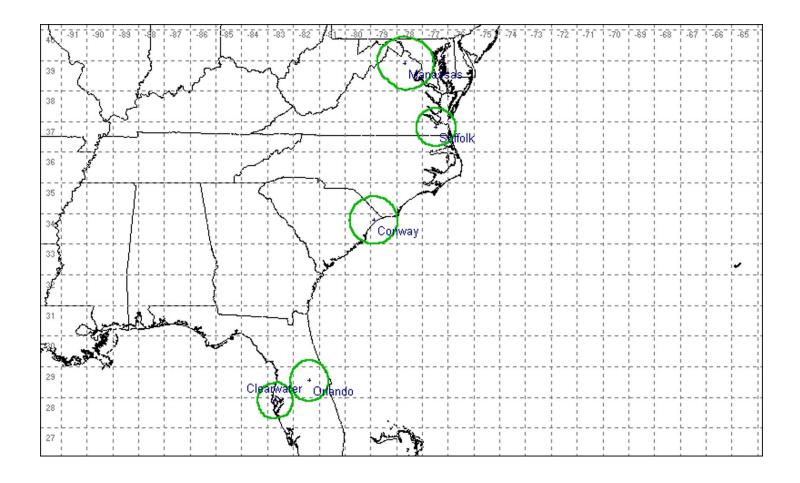
Methodology: The following four Maps were produced by Gary Stanford, engineer at Fox Ridge Communications of Gettysburg, PA, using RadioSoft's ComStudy v.2.2 software. To compute and depict in these four maps the WRV374 17 dBuV/m coverage contours, Mr. Stanford used the station data (antenna height, coordinates) from the WRV374 license as it existed prior to being renewed by the FCC on July 2, 2001.

Map #1: Shows coverage provided by WRV374, using original license parameters, for those stations reported as activated in the activation letters submitted to the FCC by 11/30/00.



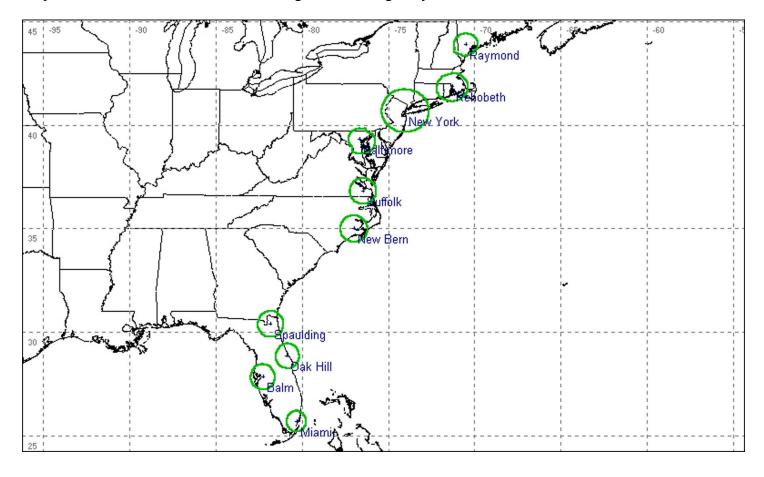
### Exhibit 2 page 2:

<u>Map #2:</u> Shows the WRV374 coverage provided by stations reported as activated in activation letters submitted to the FCC by 11/30/00, which did not report increases in antenna height and/or a change in location coordinates.



### Exhibit 2 page 3:

Map #3: Shows the stations that Orion/Regionet was originally licensed in 1996 to serve the "Atlantic Coast".



### Exhibit 2 page 4:

 $\underline{\text{Map }\#4}$ : Shows the coverage Regionet would have if they had constructed and placed into operation, per the specifications of license WRV374, all of the stations that composed WRV374 (excluding Puerto Rico). The orange circles depict those sites for which Havens did not find an activation notice or weren't reported as constructed by 11/30/00.

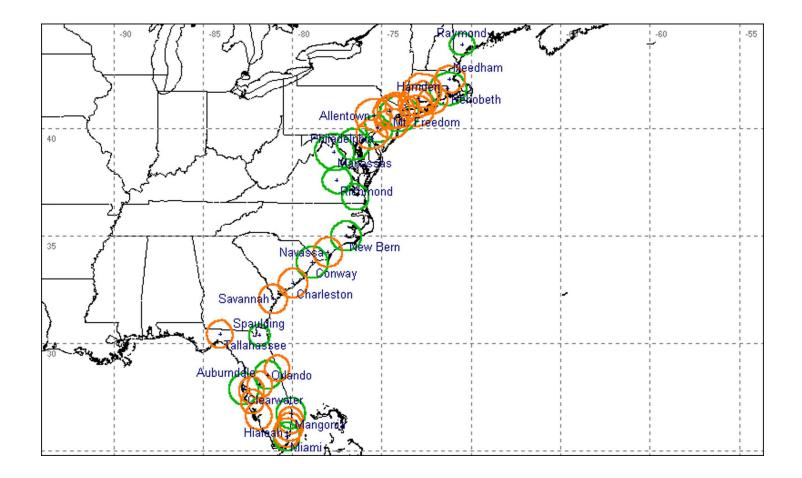


Exhibit 3: Samples of Activation Notices submitted by Regionet for WRV374 stations showing major modifications (antenna location and height changed) or that were untimely submitted after the deadline for the activation and the notice of activation on 11/30/00.



10/03/2000

Federal Communications Commission Attn: Special Services Branch 1270 Fairfield Road Gettysburg PA 17325-7245

Re: Station Activation



### Gentlemen:

In compliance with Administrative Note 46, I hereby inform you that Regionet Wireless License LLC will activate Public Coast Station WRV374 at Miami, FL. on or about November 29, 2000 to begin tests to commence service.

The facilities have been installed consistent with the terms of the authorization, except that the antenna has been placed at the 282 ft. level, as opposed to the originally licensed 60 ft. level. Additionally, the correct final coordinates are 25-41-06N, 080-18-54.3W. This location is within 0.5 miles of the original coordinates.

Regionet Wireless License LLC

Paul vander Heyden

Dated October 3, 2000

### **Exhibit 3 Page2:**

January 26,2001

Regionet Wireless Licensee LLC 3700 Campus Drive, Suite 100 Newport Beach, California 92656

Federal Communications Commission Attn: Special Services Branch 1270 Fairfield Road Gettysburg, PA 17325-7245

Re: Station Activation

### Gentlemen:

In compliance with Administrative Note 46, I do hereby inform you that Regionet Wireless License LLC will activate Public Coast Station WRV374 at Perrineville NJ on or about January 31, 2001 to begin tests to commence service.

The facilities have been installed at the licensed coordinates, and the installed antenna height is 190 ft, as compared to the originally licensed 120 ft.

Regionet Wireless License LLC

Paul vander Heyden

Date January 26, 2001

### Exhibit 4

### Regionet WRV374 Stations that have antenna heights exceeding 200 feet

1) Stations with antennas originally licensed at or below 200 feet, but recently raised above 200 feet according to activation notices. These are major modifications, require new applications and going on PN, and would now require a TV interference study and plan.

Richmond, VA

Spaulding, FL

Raymond, ME

New Bern, NC

Baltimore, MD

Miami, FL

Mangonia Park, FL

Philadelphia, PA

Rehobeth, MA

### **BROWN AND SCHWANINGER**

LAWYERS

1835 K STREET, N.W.
SUITE 650
WASHINGTON, D.C. 20006

ORIGINAL

DENNIS C. BROWN
ROBERT H. SCHWANINGER, JR.
KATHLEEN A. KAERCHER†
† ADMITTED IN PENNSYLVANIA

(202) 223-8837

GETTYSBURG OFFICE 1270 FAIRFIELD ROAD, SUITE 16 GETTYSBURG, PENNSYLVANIA 17325

December 31, 1997

Federal Communications Commission 1270 Fairfield Road Gettysburg, Pennsylvania 17325

Attention: Kim Kleppinger

Re: Request for Rule Waiver

Fred Daniel d/b/a Orion Telecom

Automated Maritime Telecommunications System Station WRV374 for the Atlantic Coast Region

Dear Ms. Kleppinger:

We represent the radio system interersts of Fred Daniel d/b/a Orion Telecom before the Federal Communications Commission. Orion is currently authorized to construct and operate Automated Maritime Telecommunications System stations along the Atlantic Coast under the regional license for station WRV374. Orion respectfully requests waiver of Section 80.49 of the Commission's Rules to provide an extension of the period of time within which it may construct the authorized facilities.

Orion is currently operating AMTS stations along the Pacific Coast, using L-T-R type trunking equipment. During Summer 1997, the Commission authorized AMTS systems to provide service to land vehicles, provided that a priority of service is given to maritime units. The equipment which Orion currently uses in its Pacific Coast system cannot be configured efficiently to assure priority of service to maritime units. (To date, priority of service to maritime units is being provided by programming onshore units only on channels which are not shared by maritime units.) Accordingly, Orion must replace its current system with equipment which is capable of providing priority to maritime units, and must construct all of its new stations using the new technology. Orion believes that its situation is unique, because Orion knows of no other instance in which the Commission has authorized an existing service to expand the class of eligible users under circumstances which will require the licensee to replace all existing equipment to be able to serve the expanded class in compliance with the Commission's Rules.



The new equipment which Orion will use is not yet in use in the United States, and, therefore, there is no experience on which Orion can rely for the new equipment's operation. The new equipment is not compatible with the L-T-R equipment which Orion is currently using. Orion expects that it will be necessary to conduct a "shakedown cruise" of the new equipment and to make software and hardware corrections and adjustments during the first year of operation. Orion has ordered more than one million dollars worth of the new equipment and, as soon as it arrives, will begin replacing its existing Pacific Coast L-T-R system with the new equipment. Each user will be provided with a new radio in exchange for its L-T-R radio.

Orion has every confidence that the new equipment will be fully satisfactory, but since the equipment is new to the United States, Orion desires to introduce it in an orderly fashion, and, thereby, maximize customer acceptance of the technology before constructing the Atlantic Coast system and placing it in operation. By identifying and resolving any technical problems that may arise in its Pacific Coast operations first, Orion intends to avoid having those problems arise in the Atlantic Coast Region.

There is no reasonable alternative to Orion's requesting an extension of time to complete construction of the Atlantic Coast system. Although Orion could, conceivably, install L-T-R equipment along the Atlantic Coast, such equipment would not allow Orion to assure priority of service to maritime units in an efficient manner. Were Orion not able, therefore, to provide service to mobiles on land, Orion's service could not be competitive with Cellular and PCS services which can provide service without regard to priorities to classes of users. While Orion could provide Atlantic Coast subscribers with L-T-R equipment initially, doing so would surely in unduly high costs for replacing the L-T-R equipment later and would result in user annoyance, disruption, and dissatisfaction at the time that new equipment was exchanged for the L-T-R equipment. Accordingly, postponing the construction and operation of the Atlantic Coast system under waiver of Rule Section 80.49, 47 C.F.R. §80.49, is the only reasonable alternative.

For all the foregoing reasons, Orion respectfully requests an extension of time to construct the facilities authorized by the license for station WRV374 to May 30, 1999.

Neither the applicant nor any party to this request is subject to a denial of federal benefits by Federal and/or state courts under authority granted in 21 U.S.C. §862.

We thank the Commission for its attention to this matter. You may direct any questions concerning this matter to this office.

Respectfully submitted,

Dennis C. Brown

Kimberly Kleppinger - glakes.ext.doc

Page 1

July 6, 2000

In Reply Refer To: 2000F/KHF

Mr. Dennis C. Brown Attorney at Law 126/B North Bedford Street Arlington, Virginia 22201

Re: RegioNet Wireless License, LLC
Request for Extension of Construction Deadline
Automated Maritime Telecommunications System
Stations KCE240, KCE278, KPB531, KUF732, and WHG943
Filed May 10, 2000

Dear Mr. Brown:

On May 10, 2000, you requested, on behalf of RegioNet Wireless License, LLC (RegioNet), a waiver of Section 80.49 of the Commission's Rules, 47 C.F.R. § 80.49, and a one-year extension of the July 14, 2000 construction deadline for the above-referenced Automated Maritime Telecommunications System (AMTS) stations at various locations along the Great Lakes. For the reasons stated below, the request is granted.

RegioNet, which is authorized to operate on AMTS Frequency Block A, requests an extension of the construction deadline because it needs additional time to obtain authority to co-locate its facilities with Paging Systems, Inc. (PSI) and then to complete construction of the authorized facilities. PSI, which is authorized to operate on AMTS Frequency Block B, filed a concurrent request for a one-year extension of the construction deadline for its Great Lakes system. RegioNet states that granting an extension of the construction deadline will allow it to provide more competitive AMTS service through its Great Lakes system as a result of co-location with PSI. In this regard, RegioNet states that co-locating with PSI will create certain economic efficiencies. It states that such a course of action is necessary in light of the realities of providing AMTS service in the Great Lakes region, particularly during the less profitable winter months when there is less maritime traffic.

Based on the record in this proceeding, we find that grant of the extension of the construction deadline is warranted. We believe that provision of more competitive AMTS offerings is in furtherance of the public interest. Therefore, we hereby GRANT the subject request to extend the construction deadline until July 14, 2001. We nonetheless note that we will be disinclined to grant any further extensions, absent showings of substantial progress towards completion of construction of the subject facilities. Thus, RegioNet will be expected to have all associated license modifications approved and

**Exhibit 6, page 2**: Regionet Erie Canal Activation Notices stating activation on 8/2/01 and 8/15/01—past the 7/14/01 deadline.

August 10, 2001

Regionet Wireless Licensee LLC 3700 Campus Drive, Suite 100 Newport Beach, California 92656

Federal Communications Commission Attn: Special Services Branch 1270 Fairfield Road Gettysburg, PA 17325-7245

Re: Station Activation

### Gentlemen:

In compliance with Administrative Note 46, I do hereby inform you that Regionet Wireless License LLC will activate Public Coast Station KCE240 at Albany NY on or about August 15, 2001 to begin tests to commence service.

The facilities have been installed at 41-29-19, 73-56-48, which is approx 70 ft from the original licensed location. In addition, the antenna has been located at the 40 ft level as opposed to the originally licensed 120 ft level..

Regionet Wireless License LLC

Paul yander Heyden

Date August 10, 2001



### Exhibit 6, page 3: Regionet Activation Notice for Erie Canal License

July 30, 2001

Regionet Wireless Licensee LLC 3700 Campus Drive, Suite 100 Newport Beach, California 92656

Federal Communications Commission Attn: Special Services Branch 1270 Fairfield Road Gettysburg, PA 17325-7245

Re: Station Activation

### Gentlemen:

In compliance with Administrative Note 46, I do hereby inform you that Regionet Wireless License LLC will activate Public Coast Station KCE240 at Beacon NY on or about August 2, 2001 to begin tests to commence service.

The facilities have been installed at the licensed coordinates and elevation.

Regionet Wireless License LLC

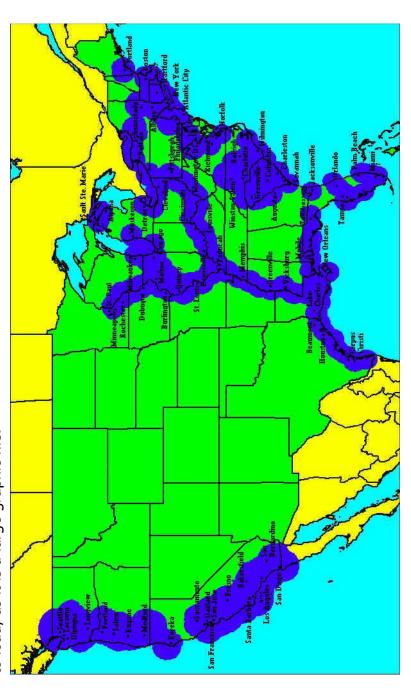
Paul vander Heyden Date July 30, 2001

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Exhibit 7: The following map showing the Mobex AMTS coverage was downloaded from their website at http://www.mobex.com/map.htm

Below description taken from: <a href="http://www.mobex.com/RNET%20Wireless.htm">http://www.mobex.com/RNET%20Wireless.htm</a>
<a href="mailto:coverage">Coverage Map</a>

This map illustrates the expected coverage area of our future communications system. Please note that this image will take a long time to load, as it is a large graphic file.



**Exhibit 8A**: **Regionet Lake Isabella Contour Map:** below map was taken from a Mobex Ex Parte Filing filed on April 19, 2001 re:PR Docket No. 92-257. The contour has been distinguished with an arrow and label.

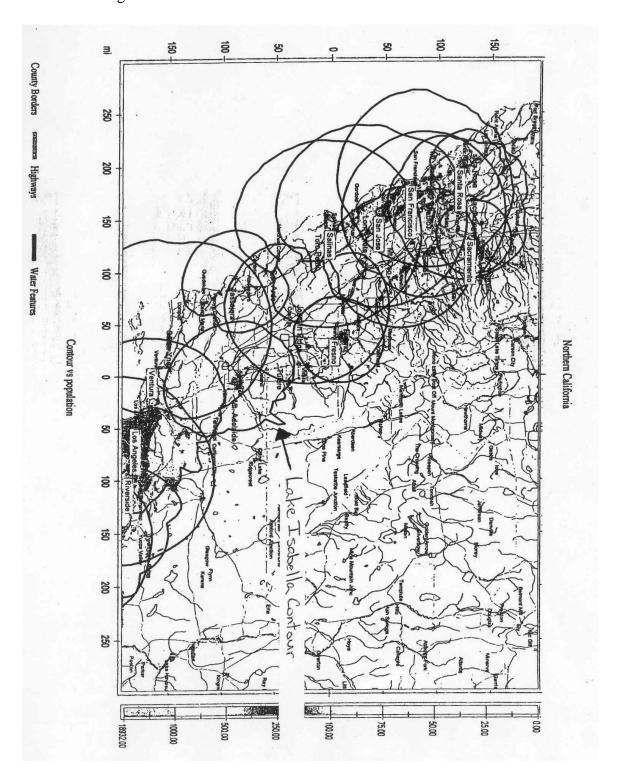


Exhibit 8B—Lake Isabella Contour Map from Fox Ridge Communications (see Exhibit 8E for explanation of methodology used to produce contour map)

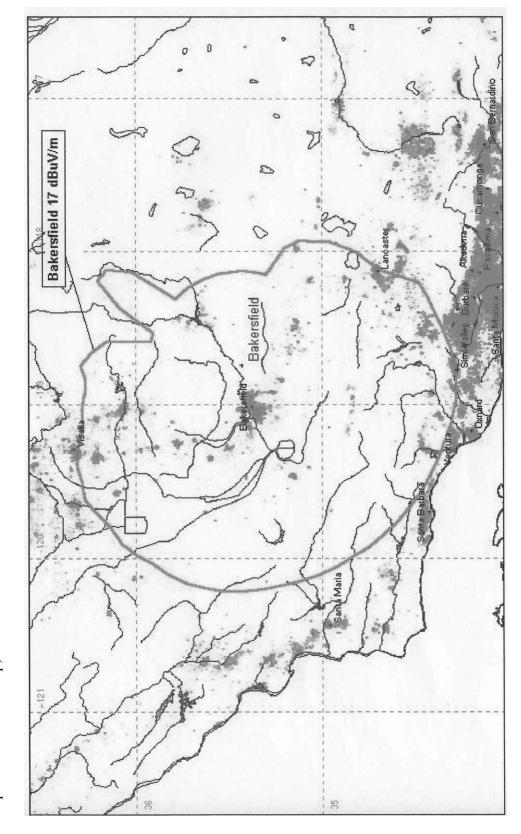


Exhibit 8C—Regionet Portland-Columbia River/Willamette River Contour Map: taken from the Regionet Portland Application licensed on 6/7/99. No contour map could be found for their Portland 1993 application.

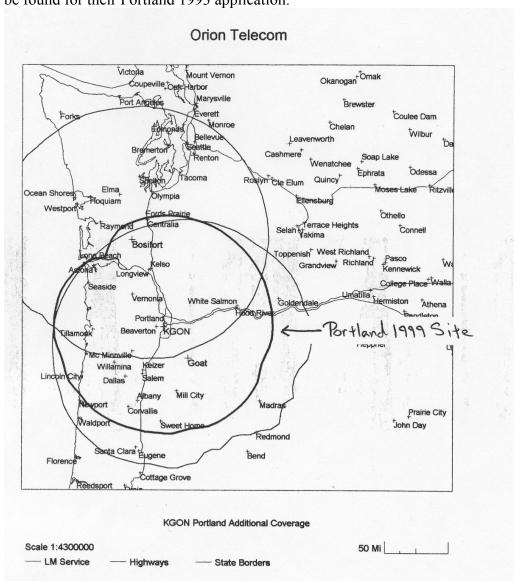
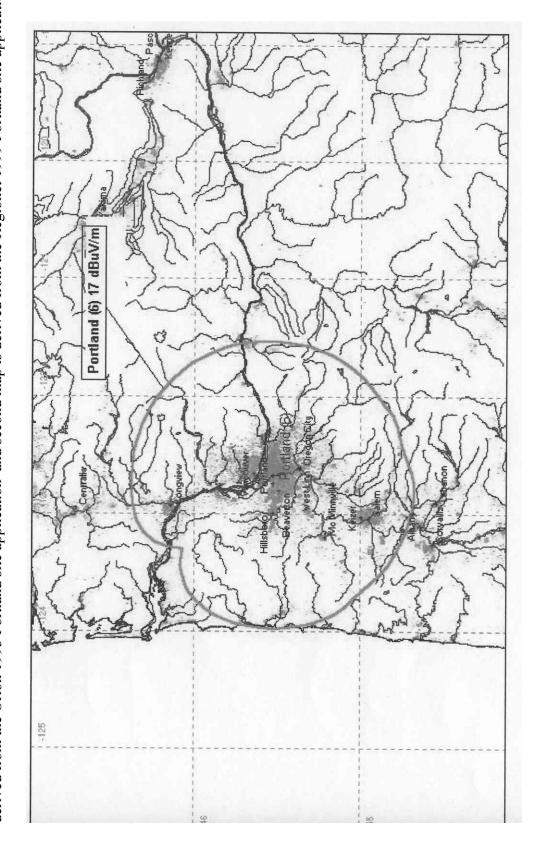


Exhibit 8D—Port of Portland-Columbia River/Willamette River Contour Maps from Fox Ridge Communications: first map is derived from the Orion 1993 Portland site application and second map is derived from the Regionet 1999 Portland site application.



Portland 17 dBuV/m

Exhibit 8D continued: 1999 Portland site contour

Exhibit 8E—Methodology Used by Gary Stanford, engineer at Fox Ridge Communications, Inc., to generate the above contour maps (Exhibits 8B and 8D) using parameters listed in original Regionet/Orion applications.

ComStudy v.2.2. Each station's 17 dbuV/m contour was generated by the software, which uses FCC F (50, Gary Stanford used the data from the original site applications to produce the above exhibits and confirmed this data with the FCC database. The program used to generate the contours was RadioSoft software, 50) propagation standards.

### Certificate of Service

I, James Stobaugh, an employee of Warren Havens, certify that I have, on this 3<sup>rd</sup> day of October 2002, placed into the USPS mail system, with 1<sup>st</sup>-class postage, a copy of the foregoing Reply, including all attachments, to the following:

Dennis C. Brown, Esq. (Counsel for Mobex) 126/B North Bedford Street Arlington, VA 22201

John Reardon Mobex Communications, Inc. 225 Reinekers Lane, Suite 770 Alexandria, Virginia 22314

James Stobaugh